Mt. Ephraim Brownfield Area-Wide Plan

COMMUNITY MEETING #2

Date: February 21, 2017
Place: Virtua Hospital – Kelly Room, 1000 Atlantic Avenue, Camden
Time: 6:00 p.m.
Objective: Obtain community input on potential reuse concepts for neighborhood brownfield sites

Participants: (from sign in sheet):

John, Isabel William
Margaret A. Haye
Hardera Bey
Rita Hughes
Barbara Olynit
Joe Sewar
Lavern William
Rose Reid-Bay
Barbara Peters
Eugene, Minnie Austin
Sean M. Brown
Sharei Pollitt
Keith Carver
Daniel Johnson
Stephanie Burwill
Sandra Cooper
Sabina Byck, EPA
Schenine Mitchell, EPA
Chuck Valentine, HACC
Namibia El, UCC
Valerie Jones
M. El
Mary Anne Harris
Chrystal Atwater
Rashaan Hornsby, HABA
Leonard Hall
Malcolm Byrd
Tanya Reed
Lynette Chalmus
Pauline Bey
F. M. Ingram
M. Davis
Amir Khan
Jim Harveson

Consultant Team: Mary Morton, WRT; Woo Kim, WRT; Leah Yasenchak, BRS; David Kutner, NJ Future

MEETING SUMMARY

James Harveson, Camden Redevelopment Authority, opened the meeting, noted that this was the second community meeting. He Indicated that the Mt. Ephraim Choice Neighborhood project, which encompasses the Liberty Park; Whitman Park; and Centerville neighborhoods, is an EPA funded project. The Choice Neighborhoods Initiative is a program of the US Dept. of Housing and Urban Development (HUD) and is intended to promote a comprehensive approach to neighborhood transformation.

Participants introduced themselves. Attendees included area businesses owners and long-time residents.

Leah Yasenchak, BRS, indicated that the goal of the project is to work with the community to address brownfields sites – sites that are either contaminated or are perceived to be contaminated, that, as a result, may have challenges related to redevelopment.

Participants expressed concern about contamination, how long, which sites, what is the nature of the contamination, how do the sites get addressed. Participants wanted to know if resources are available for site cleanup in the event that contamination extends beyond the boundaries of a parcel. Leah indicated that at the present, most sites on the inventory have no environmental investigations available. The first step in determining environmental issues is a Preliminary Assessment (Phase 1). This is a look at the historical use of the site and surrounding areas, a visual inspection of the site, and

other non-intrusive research. The next step is a Phase II / Site Investigation, where soil would be sampled to confirm or deny the presence of contamination and determine what type of contamination is present. This is then frequently followed by a Remedial Investigation to determine the extent of the contamination, and determine whether the contamination has impacted groundwater. This is followed by a Remedial Action Workplan, which lays out the preferred option for cleaning up the site, based on the intended reuse of the site.

Leah briefly reviewed the outcomes of the first public meeting that occurred on November 29th. The purpose of that meeting was to obtain community input regarding brownfield site reuse options on the larger "catalyst" sites. Participants expressed a clear preference for light industrial type development on these sites because of the job-creation potential.

Leah noted that the purpose of the current meeting is to identify the community's interest in potential redevelopment approaches, what the community's redevelopment needs are and what reuse options are financially feasible. The process is being guided by a steering committee that has been appointed by the Mayor and comprised of neighborhood leaders, city, and agency officials. Three public meetings are anticipated to enable the project team to work directly with residents to create the Mt. Ephraim neighborhood brownfields reuse plan.

Leah provided an overview of the Market Potential Analysis conducted to determine financially feasible reuse options. In order to assess potential market demand, it was necessary to evaluate an area much larger than the Mt. Ephraim neighborhood to obtain the financial data that was needed. The analysis encompassed the area within a 5-mile radius of the neighborhood, extending into Philadelphia. The analysis evaluated local employment, transportation, land use patterns, and demographic characteristics to determine brownfields redevelopment potential. The analysis indicated a regional demand for warehouse/distribution uses and a more restrained demand potential for a limited amount of research and development/high-tech space. The study also evaluated mixed-use commercial development and neighborhood retail but the regional demand for such uses is limited.

Mary Morton, WRT, conducted a live, immediate-response, survey as she reviewed redevelopment options for the two catalyst sites and the three smaller-scale brownfields sites currently under consideration. Given the outcome of the market analysis, six different reuse options are under consideration for each of the brownfield sites: parks; green infrastructure to reduce stormwater runoff; urban agriculture – community or small commercial gardens; infill housing; neighborhood retail uses; and mixed use development – retail on ground floors with housing in upper stories.

Meeting participants noted that it would be difficult for small businesses to expand because it would be necessary to address inadequate roads and infrastructure and neighborhood impacts before such expansion could occur.

The catalyst sites, Camden Laboratories and the Phil Mar sites, are the larger redevelopment parcels under consideration. These were discussed extensively during the public meeting in November.

Camden Laboratories site: an advanced conceptual plan for the reuse of this site as an extension of Whitman Park is currently under development by other parties.

Voting preferences: (participants could select up to 3 options)

- Phil Mar: Green Infrastructure (15); Mixed Use (18); Parks (7)
- 1700 Mt. Ephraim Avenue site: Green Infrastructure (5); Infill Housing (15); Neighborhood Retail (21); Mixed Use (21); Parks (5)
- Mulford Street site: Green Infrastructure (9); Infill Housing (10); Urban Agriculture (13); Parks (9)
- 1572 South 10th Street: Green Infrastructure (5); Infill Housing (15); Neighborhood Retail (5); Mixed Use (6); Parking (16)

Neighborhood residents indicated that parking in the vicinity of the 1572 South 10th Street site is extremely limited and expressed an interest in reuse of the site for residential parking. It was noted that the area parking is presently restricted by permit. Impressions about whether permit parking limitations are enforced were mixed.

Open Comment Period

- Non-profit developers should be encouraged to redevelop the brownfields sites. New Life CDC is an area non-profit.
- Whitman park is currently densely developed
- Need to encourage greater community input, connect with the Community Center, expand outreach (it was noted that the City staff personally delivered flyers to neighborhood residents in an effort to spread information about the meeting)
- Will the City post summary reports – BRS will provide reports to the CRA which will post them on their website: Camdenredevelopment.org
- EPA representative attending the meeting indicated that they have a web site that can provide information about known brownfields sites in the neighborhood. Residents were encouraged to visit https://www.epa.gov/cleanups/cleanups-my-community
- Participants expressed a desire to promote reuse options that serve younger people in the community

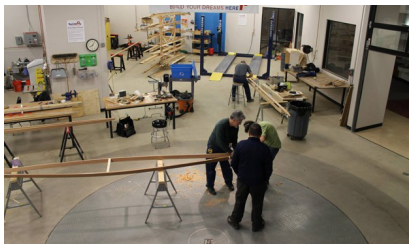
Potential Reuse Options for

THE PHIL-MAR SITE

in the MT. EPHRAIM CHOICE NEIGHBORHOOD.

Results from the Public Meeting held on Tuesday, November 29TH @ 6PM

Light Industrial

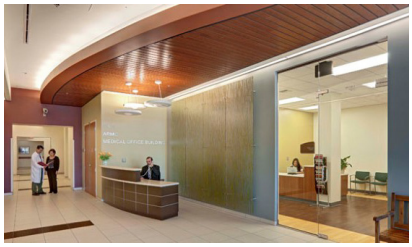


Less intensive industrial uses. They have fewer environmental impacts and are often used to produce small manufactured goods for sale.

Live-Work

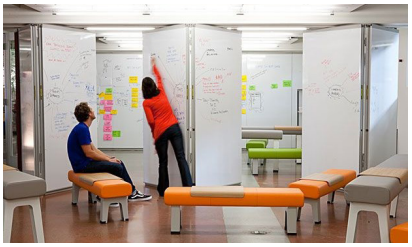
A space that is both a residence and place of business (art studio, manufacturing space, storefront, gallery, etc).

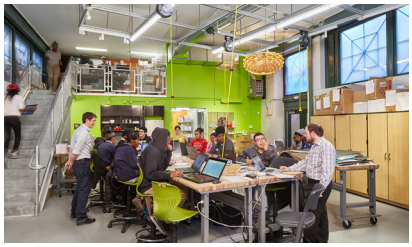
Medical Office



Offices where one or more medical doctors (dentists, general practitioners, etc.) see and treat patients.

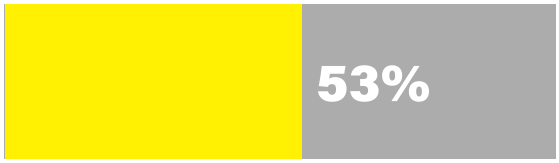
Coworking/Makerspace



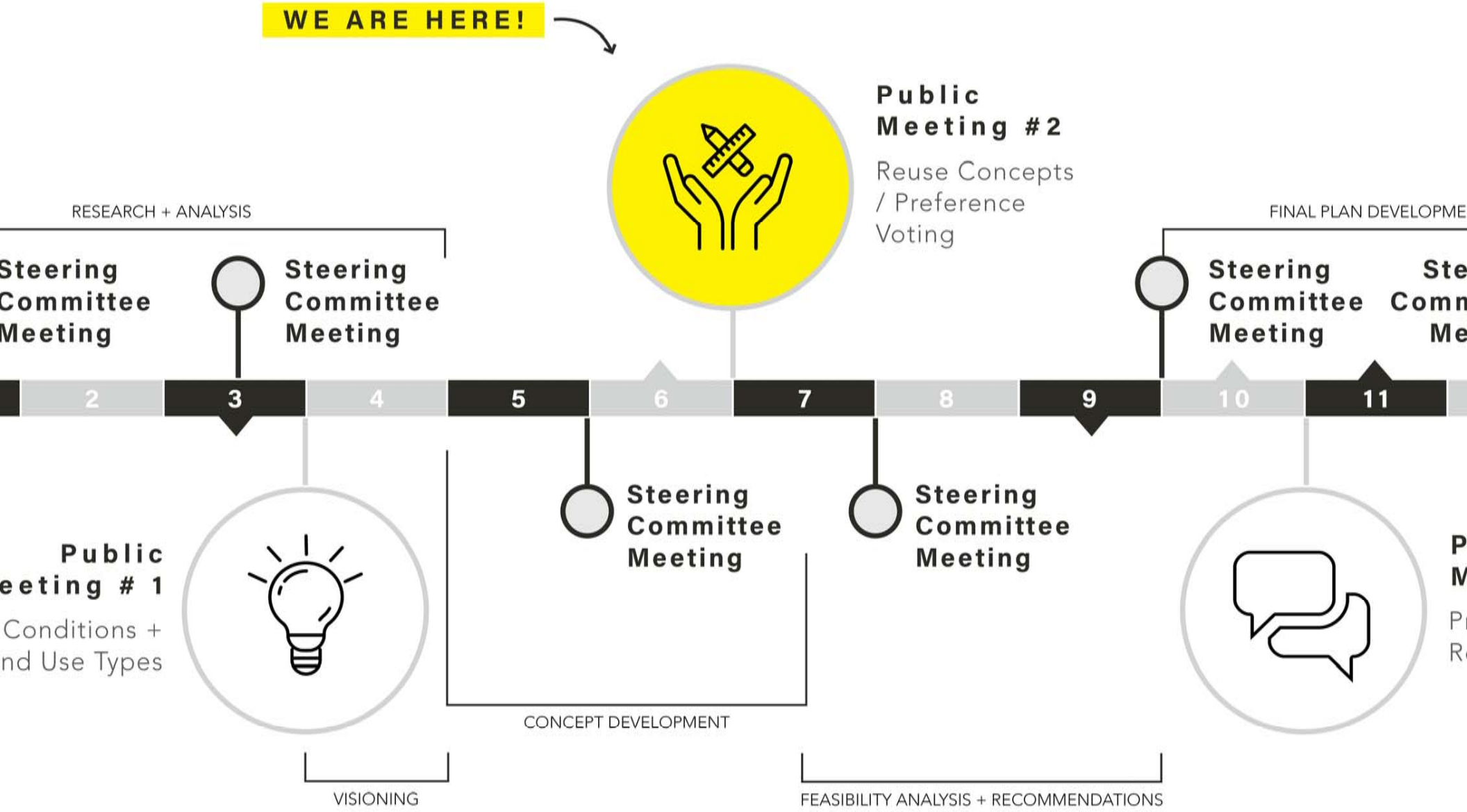


Spaces for small companies or individual freelancers/contractors to create, invent, collaborate, and conduct business meetings.

Results



BRS inc WRT


WE ARE HERE!
Public Meeting #2
Reuse Concepts / Preference Voting
RESEARCH + ANALYSIS
FINAL PLAN DEVELOPME
Steering Committee Meeting
Steering Committee Meeting
Steering Committee Meeting
Ste Comm Me
2
3
4
5
6
7
8
9
10
11
Public eeting # 1
Conditions + nd Use Types
Steering Committee Meeting
Steering Committee Meeting
P M
P R
CONCEPT DEVELOPMENT
VISIONING
FEASIBILITY ANALYSIS + RECOMMENDATIONS

SUMMARY OF ENVIRONMENTAL RECORDS

Phil-Mar Industries, Inc., 1661 Davis Street, Camden, NJ 08103 (Block 1388, Lot 7)

February 24, 2017

Executive Summary

This memo provides a summary of environmental case files for the Phil-Mar Industries, Inc. (a.k.a. "Fast Doors") site, located at 1661 Davis Street, Camden, NJ 08103. The findings presented herein are based solely on the information on file at the New Jersey Department of Environmental Protection (NJDEP) during a file review conducted on May 9, 2014. CRA and BRS, Inc. make no representation as to the accuracy or completeness of the information or the actual environmental conditions of the sites.

The findings of this review include the following:

- The site is an active case with the NJDEP and is currently being investigated and remediated jointly with the adjoining RF Products site (see attached site diagram). Northrup Grumman is the remediating party conducting the investigation/remediation activities on both sites.
- As the current investigation and future remediation are being controlled by a responsible party that is pursuing a cleanup appropriate for an industrial, 'restricted' use, there will likely be challenges if it is decided to have the site remediated for a more restrictive residential or 'unrestricted' cleanup standard.
- Soils and groundwater at the site have been found to be impacted with levels of contamination including petroleum, polyaromatic hydrocarbons and volatile organic compounds due to prior industrial operations.
- There are potential vapor intrusion concerns which exist at the site due the presence of groundwater contamination. New construction may mitigate this risk by incorporation of vapor barrier engineering controls in any new facilities.
- There is likely to be protracted timeframes with resolving groundwater contamination issues associated with the site. Additional investigation of possible on-site sources for on-site and regional contamination of groundwater by chlorinated compounds may be required by NJDEP.

Introduction

This memo provides a summary of environmental case file documents reviewed for the Phil-Mar Industries, Inc. (a.k.a. "Fast Doors") site, located at 1661 Davis Street, Camden, NJ 08103. The site is identified on Camden City tax mapping as Block 1388, Lot 7.

The tax parcel on which the site is located was created by the City of Camden through subdivision of the adjoining parcel (Block 1386, Lot 1) in 1991. Prior to that date, the Phil-Mar site had been owned and operated with the adjoining parcel (a.k.a. "RF Products") as a single industrial property since the early twentieth century. The Phil-Mar site is currently being investigated and remediated jointly with the RF

Products site under the New Jersey Department of Environmental Protection (NJDEP) Site Remediation Program (SRP) Program Interest (PI) No. 015474. The Licensed Site Remediation Professional (LSRP) of Record for both sites is David J. Russell (License No. 574867) of AECOM Technical Services, Inc. (Trevose, PA).

The entity responsible for conducting the remediation of both the Phil-Mar site and the RF Products site is Northrop Grumman System Corp. of Falls Church, VA. Northrop Grumman is the successor company of Thompson Ramo Wooldridge, Inc. (TRW) a corporation that owned and operated the industrial complex that includes the Phil-Mar site and the RF Products site in the 1960's and 1970's. A site diagram showing the location of the Phil-Mar site and the RF Products site parcels is attached to this memo.

BRS, Inc. completed a review and made electronic copies of all available NJDEP case files for the site at the NJDEP Office of Record Access in Trenton, NJ on May 9, 2014. A list of files accessed by this review is attached to this memorandum. This memo provides a summary of information gathered from review of these files.

Site Description and Background

The Phil-Mar site is located in the Whitman Park neighborhood of south Camden, NJ on an irregularly-shaped parcel approximately 4.1 acres in area. The property is bounded by Davis Street to the west; Copewood Street to the south; Thorne Street to the east; and the RF Products site (Block 1386, Lot 1) to the north. The property is located within a localized area of industrial and commercial development that adjoins a railroad right-of-way (PATCO High Speed Line) to the east across Thorne Street; however the surrounding area is predominantly residential. The Whitman Park, including a recreational playground and ball field, is located west of the site across Davis Street. The Brimm Medical Arts High School is located south of the site at 1626 Copewood Street.

The Phil-Mar site partially contains an industrial complex that covers nearly the entire site and is subdivided by interior walls into six (6) areas designated as Buildings 1, 2, 3, 4, 6, & 7. These buildings range between 12,000 – 45,000 square feet each and are of one-and two-story concrete and masonry, slab-on-grade construction. Buildings 1, 2, 3, 4 & 6 on the Phil-Mar site are currently in a state of severe disrepair and cannot be used for any purpose; these buildings have been vacant and unused since April 1991. The structure that was formerly designated as Building 5, located at the south end of the Phil-Mar site on Copewood Street, was demolished at sometime between 1961 and 1981 and is presently an empty gated lot. Building 8 of the industrial complex is located on the adjoining RF Products site and is the only structure on that parcel. A site diagram showing the layout of the seven buildings of the industrial complex shared by the Phil-Mar site and RF Products site is attached to this memo.

Initial development of the industrial complex that includes the present-day Phil-Mar and RF Products sites began in the early twentieth century when a single tax parcel encompassed both sites. Beginning in the 1920's, the Radio Condenser Company (RCC) operated at the site and eventually came to own and operate the entire complex. RCC manufactured radio condensers and various electronic components. In 1961, Thompson Ramo Woolridge (TRW) acquired the stock of RCC. TRW sold ownership of the site in 1972 but continued to operate at the site until 1979. In 1979 TRW was merged into Northrop Grumman and the TRW facility at the industrial complex was shut down. RF Products, who had operated their radio

frequency components manufacturing business in Building 8 since 1977, purchased the entire industrial complex site in 1988.

Fast Doors Inc. (owned and operated by Phil-Mar Industries) has operated from Building 7 at the industrial complex since January 1991. Fast Doors manufactures steel, industrial security doors and gates. This manufacturing process includes fabrication, mechanical assembly, and some painting. In 1993, following the subdivision of the tax lot that contained the industrial complex, Phil-Mar Industries purchased the newly created sub-divided parcel (Block 1388, Lot 7) including the five vacant buildings and its own manufacturing facility (Fast Doors) in Building 7.

History of Environmental Remediation

ECRA Case No. 91068

The purchase of Block 1388, Lot 7 by Phil-Mar from RF Products triggered the NJDEP Environmental Cleanup Responsibility Act (ECRA) leading to an environmental review of historical and current operations within the industrial complex that identified several Areas of Concern (AOCs) throughout the site. RF Products retained JCA Associates (Mount Laurel, NJ) to develop and implement the sampling plan at identified AOCs.

Two AOCs were identified on the Phil-Mar site, including one (1) 1,500- fuel oil underground storage tank (UST) adjoining Building 7 at Davis Street and one (1) 10,000-gallon fuel-oil UST located in a courtyard between Building 1 and Building 3. The Phil-Mar site was assigned ECRA No. 91068 and PI No. G000012815 by NJDEP regarding the investigation and remediation of the two USTs. (The adjacent RF Products site was assigned ECRA No. 91067).

The 10,000-gallon UST and 1,500-gallon UST at the Phil-Mar site were abandoned in place in 1993. JCA determined approximately 31 cubic yards of TPH-impacted soils associated with the 1,500-gallon UST and approximately 288 cubic yards of TPH and PAH impacted soils associated with the 10,000-gallon UST were present and were to be left in place.

NJDEP issued a "negative declaration letter" regarding the ECRA cases to both R.F. Products and Phil-Mar, Inc. in March 1993 stating the following:

> Since the current operation will be continued at this location after completion of the transaction, limited quantities of hazardous substances associated with the ongoing activities will remain on the property. These materials, as specified in your Initial Notice, considered complete by this office on March 16, 1993, are being handled in accordance with appropriate NJDEP regulations and are acceptable under the provisions of ECRA. In addition to this material, it is recognized that contaminant levels above the current NJDEP guidance levels exist at this location. Records relative to these contaminants and the corresponding Site locations can be reviewed with the ECRA case file. Please be advised that remedial measures, contaminant removal, and institutional controls may be required upon cessation of the continuing ECRA operations.

The two cases numbers assigned to the Phil-Mar site, ECRA No. 91068 and PI No. G000012815, were closed by NJDEP with approval of the Negative Declaration letter on March 31, 1993. Please note that an ECRA negative declaration letter pertains to the applicability of the site to the ECRA program. It is NOT indicative of the site being uncontaminated.

Parkside Wells Unknown Source Investigation

In the 1970's and 1980's several of the municipal wells located in the Parkside section of Camden City that provided raw groundwater to the Camden Parkside Water Treatment Plant were discovered to contain levels of chlorinated solvents in excess of US Environmental Protection Agency (EPA) and NJDEP standards for the protection of drinking water. The contaminants of concern included trichloroethene (TCE), tetrachloroethene (PCE), 1,2-dichloroethane (DCA), carbon tetrachloride, and chloroform. The Parkside Wellfield municipal wells are approximately 2,000 feet to the east of the RF Products/Phil-Mar sites and are screened within the Potomac-Raritan-Magothy aquifer.

In 2000, NJDEP began a groundwater investigation to delineate and to determine the source and/or sources of the Parkside Wellfield contamination. Following several phases of intensive groundwater and soil vapor investigations at multiple potential sources for the Parkside Wellfield contamination, including the RF Products/Phil-Mar sites, NJDEP published two reports that documented the investigation and findings at the RF Products/Phil-Mar industrial complex including the "Unknown Source Investigation Summary, Camden City Parkside Wellfield Groundwater Contamination" (November 2007) and "Expanded Site Investigation, RF Products, Inc." (September 2007). Both of these reports identified the RF Products/Phil-Mar site as a source of the chlorinated solvent contamination. The reports identify operations conducted during the period of site ownership and operation by Thompson Ramo Woolridge (TRW) between 1961 and 1979 as the potential source of the chlorinated solvent contamination emanating from that site[1].

Preliminary Assessment and Site Investigation (2010-2011)

In February 2009, an NJDEP Directive and Notice letter was issued to R F. Products, Phil-Mar Industries, Inc. and Northrop Grumman (as the successor company to TRW). The letter required that a Remedial Investigation be conducted and an approved remedial action be implemented under an Administrative Consent Order at the site, as necessary. The three Directive recipients submitted good faith defense letters to the NJDEP. Northrop Grumman agreed to "opt-in" to the New Jersey Licensed Site Remediation Professional (LSRP) program to conduct a Preliminary Assessment and Site Investigation and groundwater RI at the site.

A Preliminary Assessment (2010) and Site Investigation (2011) was performed by AECOM Technical Services, Inc. on behalf of Northrop Grumman under oversight of the LSRP of Record. Based on the results of the PA and SI, nine (9) AOCs were identified at the RF Products/Phil-Mar sites that required additional remedial investigation including the following four (4) AOCs located at the Phil-Mar site:

- AOC 2A (10,000-gallon Fuel-Oil UST) to delineate concentrations of extractable petroleum hydrocarbons (EPH) and benzo(a)pyrene above NJDEP Residential Direct Contact Soil Remediation Standards (RDCSRS), Non-Residential Direct Contact Remediation Standards (NDCSRS), and default Impact to Groundwater Soil Screening Levels (IGWSSL);
- AOC 3 (Former Railroad Tracks) to delineate and develop a site-specific impact to groundwater soil remediation standard (IGWSRS) for arsenic;

[1] It should be noted that Northrop Grumman has vigorously refuted the assertion made by NJDEP that chlorinated solvent contamination at the RF Products site has acted as a source for contamination at the Parkside Wellfield. See summary in this memo of the Remedial Investigation (2012-2013) conducted by Northrop Grumman.

- AOC 6B (Building 2, Plating Room) for further delineation of cadmium and arsenic concentrations above the RDCSRS and development of a site-specific IGWSRS for arsenic, beryllium, cadmium and TCE;
- AOC 10A (Building 2, Boiler Room) to develop a site-specific IGWSRS for cadmium.

Due to previous detections of groundwater impacts at the site identified by the NJDEP during their Unknown Source Investigation, on-site and off-site groundwater was identified as a separate area of concern (AOC 14).

Remedial Investigation (2012-2013)

AECOM completed remedial investigation activities at the RF Products/Phil-Mar sites between 2012 and 2013. According to the AECOM Remedial Investigation Report (August 2013), investigation activities were successful in delineating the horizontal and vertical extents of soil and groundwater contamination. The soil RI activities indicated that there are no direct contact issues at the site for the current industrial use of the properties; however there were exceedances for the residential direct contact soil standards. If the site use remains industrial, soil impacts requiring remedial actions are therefore limited to impact-to groundwater exceedances at isolated AOCs. Groundwater impacts include limited PAH exceedances of the NJDEP Groundwater Quality Standards (GWQS) in the area of a former heating oil UST (AOC-2A) and dissolved TCE exceedances in the southern portion of the site (adjoining Building 7 in monitoring well MW-2A) and extending off-site to the east-southeast. Background metals and additional TCE derivative compounds and other chlorinated volatile organic compounds (VOCs) are also present in this area of the site at lower concentrations that exceed the GWQS.

Based on the results of the RI, AECOM concluded that the groundwater investigation of site and regional conditions indicated that there is no evidence of a connection between site groundwater impacts and the Parkside Wellfield; no obvious point source of TCE impacts to groundwater, according to AECOM, were identified during the RI. AECOM indicated that a Remedial Action Workplan documenting a proposed approach to remediating delineated soil and groundwater impacts will be prepared and submitted to the NJDEP at a future unspecified date and that a Classification Exception Area application will be submitted with the RAW.

Vapor Intrusion Investigation (2010-2013)

An initial receptor evaluation was submitted to the NJDEP by AECOM in August 2011 that identified vapor intrusion (VI) as both a potential on-site and off-site concern warranting further investigation due to the concentrations of volatile organic compounds that exceeded the VI groundwater screening levels in on-site groundwater. The VI assessment included sampling and analysis of sub-slab soil gas and indoor air quality at the on-site Fast Doors and RF Products facilities and Brimm Medical Arts High School.[2]

The results of the VI assessment indicated the presence in sub-slab soil gas of TCE, PCE, chloroform, carbon tetrachloride and 1,1,2-TCA at concentrations in excess of NJDEP non-residential screening

[2] IAQ samples collected at Brimm Medical Arts High School in 2010 did contain concentrations exceeding the NJDEP indoor air screening levels (IASLs) triggering a response from Northrop Grumman to remediate the identified vapor concern (VC). The VC identified at Brimm Medical Arts High School was addressed as part of the Vapor Mitigation Plan dated January 31, 2011 and the Vapor Mitigation Remedial Action Report dated May 31, 2011.

levels. Subsequent analytical results for Building 7 indicated that a vapor concern potentially existed for the building and mitigation activities were therefore deemed necessary. A Vapor Intrusion Mitigation Plan was submitted to the NJDEP on January 31, 2013. Several cracks were sealed in the northeastern area of Building 7. Ventilation enhancement approaches were evaluated; however, no permanent methods for increasing ventilation were deemed necessary.

Following completion of the vapor mitigation response actions, confirmatory indoor air samples were collected in April 2013. None of the compounds analyzed in the indoor air and ambient samples were detected at concentrations that exceeded their respective NJDEP non-residential indoor air screening levels. As a result, AECOM concluded that the vapor mitigation response actions were proven to be effective at the Fast Doors facility. A Vapor Intrusion Mitigation Response Action Report that documents the mitigation actions was submitted by AECOM to NJDEP in June 2013. This report presents the data collected during the vapor remedial investigation and response action activities conducted from October 2010 through April 2013.

AECOM proposed ongoing monitoring of indoor air at the Fast Doors facility until associated sub-slab gas sample data indicates a significant drop in concentrations. Moreover, AECOM proposed to continue indoor air monitoring on an annual basis during the heating season (November - March) to confirm that indoor air concentrations of contaminants remain below their respective non-residential indoor air screening levels.

Conclusions and Recommendations for Further Actions

As per the requirements of the Site Remediation Reform Act of 2009, N.J.S.A. 58:10C-1 et seq. (SRRA) and the NJDEP Technical Requirements for Site Remediation, N.J.A.C 7:26E, the person responsible for remediating the RF Products/Phil-Mar site (Northrop Grumman) has retained a New Jersey Licensed Site Remediation Professional (LSRP) to continue and complete the remediation. According to NJDEP case files submitted in 2013, Northrop Grumman plans on completing all required remedial actions within regulatory time frames and under an Administrative Consent Order at the site, as necessary.

It should be noted that all work conducted at the site is being performed to standards appropriate for its ***current industrial usage*** which include non-residential standards for soil, groundwater and vapor contaminant pathways. As the CRA's re-use strategy for this site is to maintain industrial site use, continued environmental investigation and remediation to achieve a full-site Response Action Outcome (RAO) by Northrop Grumman is warranted based on the information reviewed for this assessment. Such activities may include additional investigation of soil and groundwater. Further, additional investigation for potential point sources for contamination of local and regional groundwater by chlorinated solvents may be required by NJDEP. Demolition or partial demolition of existing structures may be expedient to complete investigation and remediation and prepare for site re-use.

The potential presence of chlorinated solvent contamination in site groundwater may also pose elevated risks to potential users of the site. An additional vapor intrusion study will be required should elevated levels of organic constituents continue to be identified in groundwater beneath the site. New construction may mitigate this risk by incorporation of engineering controls in design and construction of new facilities.

To complete the investigation and remediation with a goal to receive a full-site RAO, the current remediating party, Northrup Grumman, and the active business on site would likely need to be involved with negotiations. The CRA could engage their own LSRP as well as experienced environmental legal counsel to review the existing environmental record to determine what additional remedial actions, if any, are required to achieve remediation goals for re-use as industrial. A scope of work to complete this final phase of investigation and remediation would include the following:

1. Completion of a Remedial Investigation Workplan (RIW) for soil and groundwater including Case Inventory Document (CID), site-specific Quality Assurance Project Plan (QAPP) and Health and Safety Program. The RIW should also include requirements for a vapor study if required by groundwater findings and a pre-demolition survey to identify and quantify the various hazardous waste streams that would be generated by demolition of the existing buildings and subsurface structures.
2. Pre-acquisition site access would need to be arranged.
3. Following the completion of the Remedial Investigation and Pre-Demolition Survey, a Remedial Action Workplan (RAW) may be developed to implement the final phase of remedial action required at the site in conformance with expected site re-use goals. If final remediation includes the use of engineering or institutional controls such as capping or a Groundwater Classification Exception Area (CEA), remedial permits, long-term biennial inspections and certifications, and deed restrictions may be required.
4. Engineering controls may need to be incorporated into subsequent design elements for new construction at the site, such as vapor barriers and ambient air monitoring and ventilation systems.

Given that Northrup Grumman is the remediating party conducting the investigation and remediation activities on the Phil-Mar site, coupled with NJDEP's assertion that they are a responsible party for the Parkside Wellfield groundwater contamination, the ability to redevelop the Phil-Mar site for non-industrial uses will likely be difficult and time consuming.

Phil-Mar Industries, Inc., 1661 Davis Street, Camden, NJ
NJDEP Case File Document Inventory

Date	Document Type	Prepared By	Prepared For	Comments
2/15/2005	Work Plan for Site Investigation – City of Camden Parkside Wellfield Contamination	NJDEP	File Document	Workplan for investigation of potential industrial sources for chlorinated contamination detected in the Camden municipal wells at the Parkside Wellfield.
07/17/2006	Site Investigation – RF Products Inc.	NJDEP	File Document	Results of Site Investigation of the RF Products site in connection with NJDEP's region-wide investigation of potential industrial sources for chlorinated contamination detected in the Camden municipal wells at the Parkside Wellfield.
09//2007	Expanded Site Investigation – RF Products Inc.	NJDEP	File Document	Results of and Expanded Site Investigation of the RF Products site in connection with NJDEP's region-wide investigation of potential industrial sources for chlorinated contamination detected in the Camden municipal wells at the Parkside Wellfield.
11/2007	Unknown Source Investigation Summary – Camden City Parkside Wellfield Groundwater Contamination	NJDEP	File Document	Results of NJDEP's region-wide investigation of potential industrial sources for chlorinated contamination detected in the Camden municipal wells at the Parkside Wellfield.

11/8/2007	Correspondence	Riker Danzig Attorneys at Law	New Jersey Department of Law and Public Safety	Protest letter from counsel for RF Products disputing the findings of the NJDEP 2007 Expanded Site Investigation that named RF products as a potential responsible party for chlorinated contamination detected in the Camden municipal wells at the Parkside Wellfield.
8/30/2010	LSRP Notification of Retention – RF Products	AECOM Technical Services, Inc. (Trevose, PA)	NJDEP	Executed Notification of LSRP Retention form for NJDEP PI No. 015474 (RF Products/Phil-Mar sites). Northrop Grumman is identified as person responsible for conducting the remediation.
01/2012	Preliminary Assessment Report	AECOM Technical Services, Inc. (Trevose, PA)	NJDEP	Standard NJDEP report and forms.
01/2012	Site Investigation Report	AECOM Technical Services, Inc. (Trevose, PA)	NJDEP	Standard NJDEP report and forms.
01/2013	Vapor Intrusion Mitigation Plan	AECOM Technical Services, Inc. (Trevose, PA)	NJDEP	Standard NJDEP report and forms.

06/2013	Vapor Concern Mitigation Response Action Report	AECOM Technical Services, Inc. (Trevose, PA)	NJDEP	Standard NJDEP report and forms.
08/2013	Remedial Investigation Report	AECOM Technical Services, Inc. (Trevose, PA)	NJDEP	Standard NJDEP report and forms.

Mt. Ephraim Brownfield Area-Wide Plan
Brownfield Inventory

Site ID	Site Name (if applicable)	Site visit date	Site Visit Type	Neighborhood	Street Address	Descriptive Location (if no address)	City	State	Zip code	Owner	Zoning	Site Size (Area)	Block	Lot	Use Intensity	Redevelopment Plan	Proposed Acquisition	Redevelopment Plan - Proposed Use	Current Use	Adjacent operating businesses	Condition of Building	Located in Floodplain
1	1572 S 10th St	8/22/2016	windshield	Liberty Park	1572 S 10th St		Camden	NJ	08104	Respond, Inc	R2	0.2755	440	99	Abandoned	Liberty Park	yes	develop new residential	vacant building	mixed residential/commercial	Poor	yes
2	SW 9th and Lansdown Ave	8/22/2016	windshield	Liberty Park		SW 9th and Lansdown Ave	Camden	NJ	08104	First Nazarene Baptist Church	R2	0.073	417	4	underutilized	Liberty Park	yes	conserve/upgrade existing residential	vacant lot	mixed residential/commercial	-	yes
3	927 Everett St	8/22/2016	windshield	Liberty Park	927 Everett St		Camden	NJ	08104	Onuoha Cajetan O	R2	0.09	420	61	Abandoned	Liberty Park	no	conserve/upgrade existing residential	commercial storage	mixed residential/commercial	Poor	yes
4	1030-1032 Everett St	8/22/2016	windshield	Liberty Park	1030-1032 Everett St		Camden	NJ	08104	Joseph Seward	R2	0.21	432	44	Abandoned	Liberty Park	yes	develop new residential	vacant building	residential	Very Poor	yes
5	NW Lowell and Warsaw St S	8/22/2016	windshield	Liberty Park		NW Lowell and Warsaw St S	Camden	NJ	08104	GSVJMW INC	R2	0.092	440	82	Abandoned	Liberty Park	no	develop new residential	vacant building	residential	Very Poor	no
6	SS Jackson 87 W of 9th St	8/22/2016	windshield	Liberty Park		SS Jackson 87 W of 9th St	Camden	NJ	08104	Camden City	R2	0.107	444	33	Abandoned	Liberty Park	no	develop new institutional uses	vacant lot	residential	-	no
7	NS Carl Miller 273 E 10th	8/22/2016	windshield	Liberty Park		NS Carl Miller 273 E 10th	Camden	NJ	08104	Hollis, Steven	R2	0.551	449	2	Abandoned	Liberty Park	no	conserve/upgrade existing residential	vacant lot w/ building	mixed residential/commercial	Good	yes
8	SW Corner of Sheridan and Marylind	8/22/2016	windshield	Liberty Park		SW Corner of Sheridan and Marylind Streets	Camden	NJ	08104	Chinn, W	R2	0.083	453	42	Abandoned	Liberty Park	yes	develop new residential	vacant lot	residential	-	no
9	1744 Mulford St	8/22/2016	windshield	Centerville	1744 Mulford St		Camden	NJ	08104	Camden City	R2	0.041	553	34	Abandoned	Centerville	no	n/a	vacant lot	residential	-	no
10	1816 S 10th St	8/22/2016	windshield	Centerville	1816 S 10th St		Camden	NJ	08104	Ferguson, H	R2	0.046	555	11	Abandoned	Centerville	no	n/a	vacant lot w/ building	residential	Satisfactory	no
11	1814-1820 Mulford St	8/22/2016	windshield	Centerville		ES Mulford St 240 N of Budd	Camden	NJ	08104	Camden City	R2	0.14	556	43, 44, 45, 89	Abandoned	Centerville	no	develop new residential	vacant lots	residential	-	no
12	Centerville Revitalization	8/22/2016	windshield	Centerville		Florence St btwn 7th/8th and 9th/10th Streets	Camden	NJ	08104	Camden Redevelopment Agency	R2	0.092	570	17	Abandoned	Centerville	no	n/a	vacant warehouses	light industry	Poor	no
13	1198 Lansdown Ave	8/22/2016	windshield	Whitman Park	1198 Lansdown Ave		Camden	NJ	08104	Orlando Rolon & Sons, LLC	R2	0.178	1328	1	Abandoned	Whitman Park	no	n/a	vacant lot w/ building	mixed residential/commercial	Very Poor	no
14	Harry Pape & Sons	8/22/2016	windshield	Whitman Park	1427-9 Haddon Ave		Camden	NJ	08103	Unity Community Center of SJ	C1	0.138	1336	43	Abandoned	Whitman Park	no	brownfield redevelopment	vacant building	commercial/ retail	Poor	no
15	BDF Industrial Fasteners	8/22/2016	windshield	Whitman Park	1360 Whitman Ave		Camden	NJ	08104	Holy Trinity Intl Ministries	C3	0.171	1348	31	underutilized	Whitman Park	no	n/a	insitutitional	residential	Poor	no
16	1700 Mt Ephraim Ave	8/22/2016	windshield	Whitman Park	1700 Mt Ephraim Ave		Camden	NJ	08104	Camden Redevelopment Agency	R2	0.114	1363	83	Abandoned	Whitman Park	no	commercial, part of "investment" zone	vacant lot	mixed residential/commercial	-	no
17	1801-1811 Norris St	8/22/2016	windshield	Whitman Park	1801-1811 Norris St		Camden	NJ	08104	GSVJMW, Inc	R2	0.03	1370	35	Abandoned	Whitman Park	no	n/a	commercial storage	mixed residential/commercial	Good	no
18	SS Browning 170 E Pershing	8/22/2016	windshield	Whitman Park		SS Browning 170 E Pershing	Camden	NJ	08104	Wilson, Arthur T	TOD	0.116	1378	19	Abandoned	Whitman Park	no	n/a	vacant lot	residential	-	no
19	Charlie & Sons Service Ctr	8/22/2016	windshield	Whitman Park	1503 Haddon Ave	SW corner of Haddon and Crestmont Ave	Camden	NJ	08103	Chomiczewski, Charles	C3	0.1045	1381	24	Abandoned	Whitman Park	no	brownfield redevelopment	vacant lot w/ building	commercial/ retail	Poor	no
20	Pro-Build	8/22/2016	windshield	Whitman Park	1601 Thorne St		Camden	NJ	08104	RF Products	C3	3.65	1386	1	fully operational	Whitman Park	no	brownfield redevelopment	industrial building	light industry	Good	no
21	RF Products	8/22/2016	windshield	Whitman Park	1605 Thorne St		Camden	NJ	08104	Foursome LLC	C3	3.95	1386	1.01	fully operational	Whitman Park	no	brownfield redevelopment	industrial building	light industry	Satisfactory	no
22	Phil-Mar	8/22/2016	windshield	Whitman Park	1800 Copewood St		Camden	NJ	08104	Phil-Mar Industries	C1	4.1	1388	7	Abandoned	Whitman Park	no	brownfield redevelopment	industrial building	light industry	Very Poor	no
23	Camden Labs	8/22/2016	windshield	Whitman Park	1667 Davis St		Camden	NJ	08104	Camden Laboratories	R2	1.8	1392	33	Abandoned	Whitman Park	no	brownfield redevelopment	vacant building	other	Very Poor	no

**The BF AWP project are also contains developed brownfield sites (or planned for redevelopment) such as the Branch Village site

existing land use

commercial/ retail
dock/port
heavy industry
light industry
other
recycling / junkyard
residential
RR yard
transportation
unknown
utility
warehouse

Use Intensity

vacant lot	Property with no improvements
Abandoned	Improved property with no business operating
underutilized	Partial use of the property
fully operational	

Brownfields 2015 Area-Wide Planning 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 clean up and revitalize brownfields sites. Under this law, EPA provides financial assistance to eligible applicants through competitive grant programs for brownfields site assessment, site cleanup, revolving loan funds, area-wide planning, and job training. Additional funding support is provided to state and tribal response programs through a separate mechanism.

Brownfields Area-Wide Planning Program

EPA's Brownfields Area-Wide Planning Program assists communities in responding to local brownfields challenges, particularly where multiple brownfield sites are in close proximity, connected by infrastructure, and limit the economic, environmental and social prosperity of their surroundings. This program enhances EPA's core brownfields assistance programs by providing grant funding to communities so they can perform the research needed to develop an area-wide plan and implementation strategies for brownfields assessment, cleanup, and reuse. The resulting area-wide plans provide direction for future brownfields area improvements that are protective of public health and the environment, economically viable, and reflective of the community's vision for the area.

Project Description

$200,000.00

EPA has selected the City of Camden Redevelopment Agency (CRA) as a Brownfields Area-Wide Planning Grant recipient. CRA will work with the community and other stakeholders to develop an area-wide plan and implementation strategy for the Mt. Ephraim Choice Neighborhood, an area characterized by high unemployment and poverty rates, and low income levels. The area is predominantly residential and commercial, and contains many vacant brownfield sites. CRA will build upon existing planning activities that the community has already developed for initiatives such as housing rehabilitation, new business creation, and the rehabilitation or demolition of existing business structures. The Area-Wide Planning project will focus on brownfields that are a major impediment for these redevelopment considerations, particularly the Camden Laboratories catalyst site. Project activities also will include additional community engagement activities, evaluation of existing planning documents and environmental data to determine the extent to which contamination and other issues will impact revitalization, and a market analysis. Key project partners who will work with the CRA include the Housing Authority of the City of Camden, Cooper's Ferry Partnership, and the Camden County Municipal Utilities Authority.

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) 637-3260
EPA Region 2 Brownfields Web site

United States
Environmental
Protection Agency
Washington, DC 20450

Solid Waste
and Emergency
Response (5105T)

EPA 560-F-15-005
March 2015

(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.

United States
Environmental
Protection Agency
Washington, DC 20450

Solid Waste
and Emergency
Response (5105T)

EPA 560-F-15-005
March 2015

City of Camden Redevelopment Agency, New Jersey
FY15 EPA Brownfields Area-Wide Planning Program
Draft Workplan for CERCLA Section 104(k)(6) Cooperative Agreement

1. ENVIRONMENTAL RESULTS

EPA Strategic Plan Goal 3: Cleaning Up Communities and Advancing Sustainable Development
Objective: Promote Sustainable and Livable Communities

CFDA: 66.814 (Brownfields Training, Research, and Technical Assistance Grants and Cooperative Agreements)

Brownfield assessment, cleanup and reuse are integral components of EPA's mission of protecting human health and the environment. By definition, brownfield sites are a potential source of environmental contaminants that could negatively affect human health and the environment.

EPA's Brownfields Area-Wide Planning (BF AWP) Program is designed to help communities confront local environmental and public health challenges related to brownfields, and benefit underserved or economically disadvantaged communities. Area-wide planning for brownfields encourages community-based involvement in site assessment, cleanup and reuse planning, as well as overall neighborhood revitalization. Through a BF AWP approach, the community identifies a specific project area that is affected by a single large or multiple brownfields, then works with residents and other stakeholders to develop reuse plans for catalyst, high priority brownfield sites and the project area surrounding these sites. These reuse plans then inform the assessment and cleanup of brownfield sites.

As the brownfields area-wide plans are implemented by the communities, and properties within the area affected by brownfields are cleaned up and reused, EPA expects there will be positive environmental outcomes related to public health, air and water quality, such as reduced exposure to contaminants, reduced greenhouse gas emissions and other air pollutants, reduced stormwater runoff, and substantial reductions in pollutant loadings in local waterways. EPA expects these types of environmental outcomes at brownfields and other infill properties that accommodate the growth and development that would otherwise have occurred on undeveloped, greenfield properties.

This BF AWP project will establish a strategy to address brownfields within the Mt. Ephraim neighborhood of Camden, which covers three neighborhoods known as Liberty Park, Whitman Park, and Centerville. The community recently completed a US Department of Housing and Urban Development (HUD) Choice Neighborhoods Planning grant targeting the Mt. Ephraim neighborhood and has submitted an application to HUD for a Choice Neighborhoods Implementation Grant. Building upon the momentum created by the Choice planning initiative, some of the beneficial outcomes expected to result from this BF AWP project include:

- Stimulate economic development: Redevelopment of the Mt. Ephraim neighborhood will create economic benefits by providing a sustainable mix of residential and commercial

components. As the area becomes safer and abandoned or vacant storefronts are identified and addressed, this area is expected to be revived into a more vibrant commercial corridor, with improved shopping choices and more commercial jobs.

- Facilitate use or reuse of existing infrastructure: Given the age and layout of the Mt. Ephraim neighborhood, extensive infrastructure already exists in the form of streets, sidewalks, and utilities. It is not expected that future redevelopment will result in large-scale block realignments that would necessitate the construction of large-scale infrastructure.
- Create or preserve green space: Area residents have expressed concerns over the lack of high quality, accessible, and safe open space. There are almost 40 acres of existing open space within the Mt. Ephraim neighborhood. Thus any reuse plan developed for the neighborhood will not be at the expense of the existing open space network and could only further help improve existing amenities.
- Equitable development: The Choice planning effort set forth the need for expansion and upgrades to the existing Section 8/public housing in the area. The *Choice Plan* calls for over 1,200 new or rehabilitated housing units for low- to low-moderate-income levels, ensuring that any 'market rate' housing stock to be developed in the community would not be at the expense of new affordable housing or the area's existing low- to low-moderate residents.

2. PROJECT DESCRIPTION

The Small Business Liability Relief and Brownfields Revitalization Act was signed into law on January 11, 2002. The Act amends the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended, by adding Section 104(k). Section 104(k) authorizes the US Environmental Protection Agency (EPA) to provide funding to eligible entities to inventory, characterize, assess, conduct planning related to, remediate, or capitalize revolving loan funds for, eligible brownfield sites. Entities are selected from proposals prepared in accordance with the Request for Proposals for the BF AWP Grant and submitted in a national competition. The City of Camden Redevelopment Agency (CRA) was selected as a BF AWP grant recipient in the FY 2015 competition.

2.a Objective

The CRA will facilitate community involvement and conduct research/technical assistance activities that will enable them to develop a BF AWP, including a robust plan implementation strategy, for the Mt. Ephraim neighborhood. One brownfield site is considered a catalyst, high priority site this project area. The reuse strategies and plans developed for this brownfield site through this project are being done to help facilitate site assessment, cleanup and eventual redevelopment.

This goal will be accomplished by performing the tasks of cooperative agreement management, community outreach, research and analysis, visioning, and preparation of a BF AWP with implementation strategy that will help lead to assessment and cleanup of brownfields in the community. These activities will ultimately help determine the viable future reuse for the catalyst site in particular—the Camden Labs site on Davis Street.

Cooperative agreement funding will be used to cover the costs of activities at or in direct support of brownfields sites as defined under CERCLA §101(39). The overall coordination of the cooperative agreement will be carried out by the CRA's Project Manager, Director of Economic Development James Harveson. Mr. Harveson will oversee a planning consultant team that will facilitate community outreach, conduct the research, as well as perform the visioning and planning efforts and all other tasks necessary to develop the BF AWP.

2.b Results or Benefits Expected

During the course of the aforementioned HUD Choice planning initiative, local officials partnered with non-profit organizations, residents, business owners, universities, and other stakeholders to help revitalize the Mt. Ephraim neighborhood. The CRA will engage these same organizations and individuals in this BF AWP project. As is further outlined below, the CRA expects to hold three community meetings at different points during the BF AWP project to ensure the community is part of the planning process.

The activities and information gathered under this cooperative agreement will be done in a manner that facilitates subsequent assessment, cleanup, and redevelopment of brownfields sites.

2.c Approach

2.c.i. Activities/Tasks/Methodology

This AWP program will be developed in close consultation with EPA Region 2 Brownfields Program. EPA's Office of Brownfields and Land Revitalization may also be consulted.

Task 1 – Cooperative Agreement Oversight

Activities to be performed under Task 1 include:

- Competitively procure a planning consultant team to facilitate community outreach, conduct research, and perform the visioning and planning efforts and all other tasks necessary to develop the BF AWP;
- Competitively procure a professional grant management consulting firm with experience in managing federal grants to ensure all grant requirements are met;
- Providing project management services to manage consultants as well as acting as a liaison with the supporting non-profits, regulatory agencies, and other city entities involved in the development of the BF AWP;
- Attending relevant trainings and conferences, including a mid-project training meeting for all FY15 AWP grantees and other miscellaneous regional grantee meetings and workshops as they arise. *Note*: The CRA's attendance at the Brownfields 2015 conference in September 2015 will be funded by other EPA brownfields grants;
- Routine project calls with EPA Project Officer;
- Reporting as needed in EPA's ACRES database. The CRA will coordinate with EPA Project Officer to ensure all project leveraging information is reported and assessed and/or cleanup property(ies) in the BF AWP area are associated to the BF AWP grant;
- Preparing all reporting required by EPA, including quarterly reports, annual Federal Financial Reports, and annual MBE/WBE utilization reports;
- Workplan deliverables tracking; and
- Project closeout.

Task 1 will be conducted by:

- James Harveson, Director of the CRA's Division of Economic Development, has been overseeing brownfield remediation projects in Camden for more than seven years and will serve as the Project Manager of the AWP Grant. Mr. Harveson has nearly 30 years' experience in urban redevelopment.
- A professional grant management consulting firm will be competitively procured in accordance with all applicable state and federal regulations, using procurement systems already in place. This firm will oversee activities mentioned above, such as all reporting required by EPA, including quarterly reports, annual Federal Financial Reports, and annual MBE/WBE utilization reports.
- A CRA graduate student intern from the University of Pennsylvania will assist with cooperative agreement oversight activities.

Key task deliverables of Task 1 are expected to be:

- Request for proposals for planning consultant team to facilitate community outreach, develop the BF AWP, etc.
- Request for proposals for professional grant management consulting firm that will assist with grant implementation and compliance.

Task 2 – Community Outreach

Activities to be performed under Task 2 include:

- Representatives to include residents, non-profit organizations, community development corporations, anchor institutions, and various City agencies comprised the Choice Neighborhood Executive Leadership Council. This body was convened to guide the development of the HUD *Choice Plan* and will be reconvened for the development of the BF AWP. This will not only ensure continuity with the prior planning efforts but will also enable the brownfield focus of this effort to build upon the foundations of existing planning efforts. A minimum of 12 Choice Neighborhood Executive Leadership Council meetings are anticipated.
- Community meetings are expected to occur at various milestones:
  - Community Meeting #1: An initial kickoff meeting will be held once the CRA has procured the planning consultant team to roll out the project and solicit initial public input.
  - Community Meeting #2: This meeting will be held after the completion of Task 3 (described below) and as part of the initial stages of Task 4. This meeting will present the finding of the research and analysis effort (Task 3), which will inform the development of the visioning and planning for the BF AWP (Task 4). The community will be presented with potential reuse scenarios for the catalyst site. Their feedback will be solicited so that decisions can be made regarding the designated reuse of the catalyst site and any secondary sites deemed priorities for development. This feedback will be essential to the completion of Task 4.
  - Community Meeting #3: Upon development of the draft BF AWP, the draft will be presented to the community to present the outcomes of the work performed to date and to solicit public input regarding the draft BF AWP.

Task will be conducted by:

- The planning consultant team will coordinate and convene the Choice Neighborhood Executive Leadership Council steering committee meetings for the duration of the EPA grant period.
- The community meetings will be facilitated by the planning consultant team.
- A CRA graduate student intern from the University of Pennsylvania will support the outreach and community engagement activities.

Key task deliverables are expected to be:

- Minutes from Choice Neighborhood Executive Leadership Council steering committee meetings.
- Minutes, including documentation of public input, from community meetings.

Task 3 – Research & Analysis

These activities will be designed to help identify possible reuses for brownfields that will meet community health, environmental, and economic development goals and will help lead to assessment and cleanup of brownfield sites. Activities to be performed under Task 3 include:

- Existing Plan/Data Review: Assisted by a CRA graduate student intern, the planning consultant team will collect and review existing documents associated with the project area. The documents are expected to include the recently developed *Whitman Park Redevelopment Plan*, the HUD *Choice Plan*, the City *Master Plan*, and the city's *Comprehensive Economic Development Strategy*. In order to establish the baseline understanding of the environmental contamination issues for the area, the planning consultant team will be provided the reports and other documents obtained during the file search conducted for the catalyst site with the New Jersey Department of Environmental Protection (NJDEP).
- Brownfield Inventory: The CRA previously obtained assistance from the New Jersey Institute of Technology (NJIT) Technical Assistance to Brownfields (TAB) Program whereby sites with which the CRA had been engaged were catalogued and prioritized. This exercise focused on those sites that have already been identified for development and only included two sites, not including the catalyst site, in Mt. Ephraim. The planning consultant team will be tasked to identify brownfield sites in the area and catalogue their size, ownership type, condition, redevelopment constraints, and other information that would be used to inform redevelopment potential.
- Brownfield Prioritization: Using site ranking criteria developed by the aforementioned TAB effort, the planning consultant team will analyze the information and rank the sites. Sites scoring high will be considered second-tier catalyst sites, provided they meet EPA eligibility criteria, and will be included in the community visioning efforts and the BF AWP. It is assumed that a total of three such sites will be identified. NJDEP and EPA file reviews will be conducted for these sites in order to gather information regarding prior assessment and remediation efforts at the sites. If necessary, Phase I environmental site assessments will be conducted on second-tier catalyst sites to inform the planning process.

Task will be conducted by:

- A CRA graduate student intern from the University of Pennsylvania will assist with collecting and reviewing existing documents associated with the project area.

- The planning consultant team will develop the brownfield inventory and analyze and rank the sites using the ranking criteria developed by the TAB program.

Key task deliverables are expected to be:

- Report documenting existing conditions.
- Updated brownfield inventory for the Mt. Ephraim neighborhood.
- Prioritized list of brownfield sites.
- Documentation of NJDEP and EPA file reviews for second tier catalyst sites.
- Phase I environmental site assessments, as needed.

Task 4 – Visioning

Activities to be performed under Task 4 include:

- Site Redevelopment Prioritizations: Similar to the brownfields site ranking criteria set forth in Task 3, the CRA would like to develop a redevelopment prioritization system that will identify the likelihood of success for various redevelopment options on the primary and second-tiered catalyst sites. The planning consultant team will develop an algorithm for redevelopment considerations for these sites. The algorithm will take into consideration community interest, proximity of transportation infrastructure, water/sewer infrastructure, open space network, green infrastructure linkage/usage, existing plan support, market viability, redevelopment constraints, and other parameters. The result will be a ranking of reuse scenarios for the catalyst properties in order to identify the likelihood of success with any given reuse for the sites.
- Conceptual Sketches: To assist with soliciting community input for the determination of the catalyst site's reuse, the planning consultant team will produce visual sketches of the highest ranked reuse for the site to use at Community Meeting #2. The planning consultant team will work within the parameters for site reuse that are set forth in both the *Whitman Park Redevelopment Plan* and the HUD *Choice Plan* to ensure consistency between the BF AWP and preceding planning efforts. Upon completion of Community Meeting #2, the conceptual designs will be finalized and are expected to assist with the solicitation of a developer for the site.

Task will be conducted by:

- The planning consultant team will develop the algorithm for redevelopment considerations for the primary and second-tiered catalyst sites.
- The planning consultant team will develop the conceptual sketches of the highest ranked reuse for the catalyst site.

Key task deliverables are expected to be:

- Redevelopment prioritization system.
- Conceptual sketches.

Task 5 – BF AWP Preparation

Task 5 will involve producing a single planning document, the Mt. Ephraim BF AWP, which will contain the culmination of the prior tasks and the input solicited from stakeholders. The process used to develop the evaluation and ranking of the prior research and analysis efforts will be used to establish the framework for redeveloping the catalyst sites. The Mt. Ephraim BF AWP

and implementation strategies will identify specific actions and resources available, resources needed to assess, cleanup and reuse brownfields and to promote area-wide revitalization overall. The BF AWP, at this time, is expected to include:

- A listing of the documents obtained and reviewed;
- The results of the brownfield inventory, brownfield prioritization, and the site redevelopment prioritizations;
- The selected reuse of the catalyst sites from the community meetings as well as the conceptual designs for the catalysts sites. The designs will be predicated upon the outcome of the site redevelopment prioritization algorithm as well as the community input obtained from Community Meeting #2;
- A summary on the community involvement activities, priorities identified, and a statement which clearly describe how the community input is reflected throughout the plan's recommendations and strategies;
- The results from research on brownfields and project area conditions, including known environmental conditions, data gaps and other existing conditions (such as environmental/social/health conditions, economic realities/market potential, and state of existing infrastructure in the project area);
- Specific reuse scenarios/plans for the catalyst, high priority brownfield sites;
- Information on how assessment and cleanup of those sites will be influenced by the reuse strategies;
- An explanation of brownfield cleanup/reuse connections to green infrastructure, greener remediation, sustainable redevelopment and/or smart growth elements of your plan;
- A detailed action plan which identifies specific actions, resources available, and resources needed to implement the plan, such as:
    - Assessment and cleanup activities needed to be compatible with the brownfields reuse scenarios
    - Catalyst, high priority brownfield site(s) improvements and other project area improvements needed to support brownfields reuse and advance sustainable and equitable revitalization within the project area;
    - What actions are needed near-term versus long-term, and prioritized projects that indicate where/how to start implementing the plan;
    - Who is going to lead each effort;
    - Specific sources of funding and investment and other resources needed in the project area; and
- Other miscellaneous topics will be incorporated into the BF AWP as needed and appropriate.

<u>Task will be conducted by</u>:

- The planning consultant team will develop the draft BF AWP. The team will then present the draft BF AWP to local stakeholders at Community Meeting #3.
- Based on input provided during Community Meeting #3, the plan will be revised and finalized. The plan will also be presented to the City, the City's Planning Board, and to City Council for action to amend the *Whitman Park Redevelopment Plan* to include the BF AWP as a supplement to the plan.

<u>Key task deliverables are expected to be</u>:

- Draft BF AWP.
- Finalized BF AWP.
- Documentation of adoption of BF AWP by the Choice Neighborhood Executive Leadership Council (which may possible to occur after end of EPA grant period).

2.c.ii. Schedule/Milestones/Deliverables

Task	Approximate Timeframe	Expected Deliverables
Task 1: Cooperative Agreement Oversight	7/1/15-6/30/17	• EPA reporting materials • RFP for planning consultant team • RFP for grant management
Task 2: Community Outreach	• Executive Leadership Council Meetings to take place every other month • Community meetings to take place 10/15, 5/16, and 2/17	• Minutes from Choice Neighborhood Executive Leadership Council steering committee meetings • Minutes, including documentation of public input, from community meetings
Task 3: Research & Analysis	10/1/15-3/31/16	• Report documenting existing conditions • Updated neighborhood brownfield inventory • Prioritized list of brownfield sites • File reviews of second tier catalyst sites
Task 4: Visioning	4/1/16-9/30/16	• Redevelopment prioritization system • Conceptual sketches
Task 5: BF AWP Preparation	10/1/16-6/30/17	• Draft Mt. Ephraim BF AWP • Final Mt. Ephraim BF AWP • Documentation of adoption of BF AWP by the Choice Neighborhood Executive Leadership Council

2.c.iii. Program Evaluation

2.c.iii.1. Anticipated Outputs or Outcomes

The tracking, measurement, and documentation in achieving the project outputs will be the responsibility of the CRA. The CRA has identified the outputs that will result from this project, including:

- Number of EPA reporting materials issued
- RFP for planning consultant team
- RFP for grant management consultant
- Number of Choice Neighborhood Executive Leadership Council meetings
- Number of community meetings
- Number of attendees at community meetings

- Report documenting existing conditions
- Updated neighborhood brownfield inventory
- Prioritized list of brownfield sites
- File reviews of second-tier catalyst sites
- Redevelopment prioritization system
- Conceptual sketches
- Draft BF AWP
- Final BF AWP
- Adoption of plan by the Choice Neighborhood Executive Leadership Council

2.c.iii.2. Measures of Success

The CRA will track the progress of all outputs on a quarterly basis to ensure overall project progress. Because the outputs are quantitative, measurement is expected to be straightforward. Documentation of these performance measures will be found in the project's quarterly and final reports.

2.c.iv. Reporting

2.c.iv.1 Quarterly Reporting

The CRA will complete and submit to EPA quarterly reports, as per the grant terms and conditions, and will also consult with their individual EPA Project Officer on project-specific reporting needs. Quarterly report will include information on work status, work progress, difficulties encountered, preliminary results and a statement of activity anticipated during the subsequent reporting period. A discussion of expenditures and financial status for each workplan task, a comparison of the percentage of the project completed to the project schedule, changes in key personnel concerned with the project, an explanation of discrepancies, and any other information requested through terms and conditions will also be included in the report. Upon completion, deliverables under this workplan will be submitted as soon as they are done.

Each quarterly report will also include information on the following:

- Summary of successes/challenges over the past quarter;
- Assistance needed from EPA;
- Narrative update on each workplan task, including:
    - All community involvement activities held during the reporting period and those expected in the next reporting period;
    - Initiation or completion of key project deliverables and milestones, as identified in this workplan (e.g., existing conditions report, market study, infrastructure analysis, project mapping, etc); and
    - Existing, planned or desired partnership and coordination activities with other entities (e.g., report on efforts to coordinate this project with community-based organizations, local, regional, state, tribal or federal agencies, foundations, etc., and briefly explain why these are relevant to this project).
- ACRES reporting information:
    - Leveraged funds or resources that help to accomplish the BF AWP project and those leveraged funds/resources that will help implement improvements in the BF AWP project area; and

- Associated brownfields assessment or cleanup properties within the project area.

2.c.iv.2. Final Cooperative Agreement Technical Report

The CRA will complete and submit to EPA a final report documenting project activities over the entire project period. The final technical report will include information requested through the grant terms and conditions, including:

- Project successes
- Project challenges
- Lessons learned and best practices
- Identification of significant partners, source and amount of leveraged resources, and any resources leveraged to continue the project after the expiration of the brownfields grant,
- ACRES information, including:
  - Resources leveraged beyond the EPA grant during the project, including how they were used, and any resources leveraged to continue the project after the expiration of the brownfields grant; and
  - Associated brownfields assessment or cleanup properties within the BF AWP project area.
- A summary of accomplishments for each of the grant workplan tasks and an explanation of why any tasks were not completed.
- A budget table that compares total budgeted amounts and total amounts spent.

2.c.iv.3. Final Brownfields Area-Wide Plan

In addition to final technical report, the CRA will complete and submit to EPA a final BF AWP with implementation strategies and next steps, as described in Task 5 above and in accordance with the grant terms and conditions. The final BF AWP will tie together the BF AWP activities and deliverables included in this workplan, and will describe the CRA's process.

2.d. General Project Information

2.d.i. Data to be Collected and Maintained

Any additional data collected during the course of the project will be maintained by the CRA with assistance from the grant management consultant. Such data could include information provided by the public during the community meetings and data from documents obtained during the aforementioned file search conducted for the catalyst site with NJDEP. In addition, grant-funded documents will be posted to the CRA's website as needed.

2.d.ii. Coordination Activities with Other Grants, Government and Non-Government Projects/Programs

In 2012, HUD awarded a Choice Neighborhoods Planning grant targeting the Mt. Ephraim neighborhood. This EPA BF AWP builds upon the momentum created by the Choice planning initiative by focusing on developing a strategy for addressing brownfields. Brownfields were one of the primary impediments identified in the area's HUD *Choice Plan*.

With the award of the HUD grant, a public accountability and governance structure was established for the Mt. Ephraim neighborhood revitalization initiative. Supported by six task forces, the Choice Neighborhood Executive Leadership Council established under the HUD

grant contains representatives from the City, the Housing Authority, the CRA, residents, non-profit community development corporations like Cooper's Ferry Partnership, anchor institutions such as Virtua Hospital and Our Lady of Lourdes Hospital, and Camden County Municipal Utilities Authority and the Delaware Valley Regional Planning Commission. A similar structure using the Choice Neighborhood Executive Leadership Council will be utilized for the BF AWP project. The continued involvement of the regional Delaware Valley Regional Planning Commission will ensure regional support and input in the BF AWP project.

In addition, a Choice Implementation Grant application was recently submitted to HUD. In the event of an award, the CRA will ensure that the EPA BF AWP effort will be coordinated with the HUD implementation program.

3. QUALITY ASSURANCE

Prior to undertaking any activity that uses existing environmental data, the CRA will consult with the EPA Regional project officer to determine if the CRA will need a Quality Assurance Project Plan (QAPP). The EPA Region 2 office will determine if a QAPP is required, based on the activities described in this workplan. If required, the CRA will prepare and submit a QAPP which meets with the approval of the U.S. EPA Region. The EPA Region 2 may require that QAPP elements include describing the environmental data to be considered acceptable, how these data are to be used, and sufficient criteria and controls to ensure only data of adequate quality are used to meet project objectives. If required, the QAPP must be approved prior to the CRA conducting any work related to the use of the existing environmental data.

Generating environmentally related measurements or data is not anticipated to be performed by the CRA as part of this grant.

4. BUDGET

4.a. Budget Description

See the attached Application for Federal Assistance Budget Page (Form 424a), which also outlines the amounts listed below. The following presents the anticipated budget. Budget line items are subject to change based upon the actual costs provided in the selected consultant team's proposal.

Budget Categories	Task 1 Cooperative Agreement Management	Task 2 Community Outreach	Task 3 Research & Analysis	Task 4 Visioning	Task 5 BF AWP Preparation	**Total**
Personnel	$6,490	$6,542				$13,032
Fringe	$1,889	$1,904				$3,794
Travel	$3,000					$3,000
Equipment						$0
Supplies	$2,500					$2,500
Contractual	$5,000	$25,000	$35,500	$33,000	$71,674	$170,174
Other	$2,500	$2,500	$2,500			$7,500
TOTAL	**$21,379**	**$35,946**	**$38,000**	**$33,000**	**$71,674**	**$200,000**

4.b. Budget Narrative

Task 1 Cooperative Agreement Oversight Budget				
Item	**Unit**	**Qty.**	**Unit Cost**	**Subtotal**
Personnel: CRA Project Manager	HR	125	$51.92	$6,490
Fringe: CRA Project Manager	%	-	29.11	$1,889
Travel: Fall 2016 mid-project training meeting for all FY15 BF AWP grantees & other AWP events (*Note: travel to EPA Brownfields Conferences will be funded by other EPA brownfields grants awarded to the CRA*)	Event	2	$1,500	$3,000
Supplies: Items for cooperative agreement oversight and community outreach presentations/engagement. Purchases are expected to include, a laptop, a desktop computer, and other office supplies as needed *(Note: Because EPA defines equipment as an individual item that costs $5,000 or more, these items are being considered supplies)*	Lump Sum	-	-	$2,500
Contractual: Grant Management Consultant	YR	2	$2,500	$5,000
Other: Graduate Intern	Lump Sum	-	-	$2,500
Task 1 Total				**$21,379**

Task 2 Community Outreach Budget				
Item	**Unit**	**Qty.**	**Unit Cost**	**Subtotal**
Personnel: CRA Project Manager	HR	126	$51.92	$6,542
Fringe: CRA Project Manager	%	-	29.11	$1,904
Contractual: Planning Consultant Team	Lump Sum	-	-	$25,000
Other: Graduate Intern	Lump Sum	-	-	$2,500

Task 2 Total	**$35,946**

Task 3 Research & Analysis Budget				
Item	**Unit**	**Qty.**	**Unit Cost**	**Subtotal**
Contractual: Research & Analysis	Lump Sum	-	-	$18,000
Contractual: Brownfield Inventory	Lump Sum	-	-	$12,000
Contractual: Brownfield Prioritization	Lump Sum	-	-	$5,500
Other: Graduate Intern	Lump Sum	-	-	$2,500
Task 3 Total				**$38,000**

Task 4 Visioning Budget				
Item	**Unit**	**Qty.**	**Unit Cost**	**Subtotal**
Contractual Site Redevelopment Prioritization	Lump Sum	-	-	$23,000
Contractual Concept Sketches	Lump Sum	-	-	$10,000
Task 4 Total				**$33,000**

Task 5 BF AWP Preparation Budget				
Item	**Unit**	**Qty.**	**Unit Cost**	**Subtotal**
Contractual Draft AWP	Lump Sum	-	-	$51,000
Contractual Final AWP	Lump Sum	-	-	$20,647
Task 5 Total				**$71,647**

All lump sum expenses, including those for the CRA's graduate intern and all consultants, are based on prior costs for other efforts similar in scope to the BF AWP.

5. LEVERAGING

EPA expects the CRA to make the effort to secure the leveraged resources described in their cooperative agreement proposal. Given that many of the leveraged resources are for efforts that have already been implemented, the CRA is expected to abide by their proposed leveraging commitments during the EPA grant performance period; failure to do so may affect the legitimacy of the award.

Resources Leveraged for Project Outputs: Many of the resources the CRA has leveraged thus far for the Mt. Ephraim Neighborhood are in support of project outputs and associated activities. As was aforementioned, the CRA obtained assistance from the NJIT TAB Program whereby sites with which the CRA had been engaged were catalogued and prioritized. The NJIT TAB assistance to create a brownfield prioritization mechanism will be leveraged as part of Task 3 as new sites are identified in Mt. Ephraim AWP inventory effort and prioritized to identify second tiered catalyst sites. The estimated value of the technical assistance provided by NJIT was $8,500, based upon cost estimates provided by private consultants. The use of EPA Assessment funding for a contractor to conduct the file reviews and evaluate the date for two sites in the areas—including the catalyst Camden Labs site—was $5,289.25. It should be noted that additional resources will be leveraged for brownfields investigation activities as supporting assessment work is expected to be conducted during the course of implementing the AWP project.

Resources Leveraged for Project Outcomes: The long-term AWP outcomes for which the CRA has leveraged resources include:

- $300,000 HUD Choice Neighborhoods Planning Grant;
- $96,000 local Economic Recovery Board Planning Grant to prepare the *Whitman Park Redevelopment Plan*;
- $400,000 local Economic Recovery Board Acquisition Grant to fund City acquisitions of 65 vacant properties under state Abandoned Property Rehabilitation Act; and
- $8 million City bond for demolition of an estimated 500 properties in Mt. Ephraim.
- A potential funding source for assessment and remediation are the CRA's EPA assessment grants and the CRA's EPA Revolving Loan Fund grant.
- A potential funding source for development is the HUD Choice Neighborhoods Implementation grant. The City Housing Authority will be submitting an application for the next round of funding for public housing construction/rehabilitation.
- A potential funding source for development is the State Economic Redevelopment and Growth Program. This developer incentive program provides state grants for up to 30% of total project costs. A total of $175 million is earmarked specifically for Camden.

SUMMARY OF ENVIRONMENTAL RECORDS

Camden Laboratories, 1667 Davis Street, Camden, NJ 08103 (Block 1392, Lot 33)
February 24, 2017

Executive Summary

This memo provides a summary of environmental case file documents reviewed for the Camden Laboratories site, located at 1667 Davis Street, Camden, NJ 08103 (Block 1392, Lot 33). The findings presented herein are based solely on the information on file at the New Jersey Department of Environmental Protection (NJDEP) during a file review conducted on May 9, 2014. CRA and BRS, Inc. make no representation as to the accuracy or completeness of the information or the actual environmental conditions of the sites.

The findings of this review include the following:

- The site is an active case with the NJDEP Site Remediation Program (SRP). Outstanding environmental issues must be addressed in accordance with state law.
- There have been prior environmental assessments and limited environmental remediation activities conducted at the site between 1989 and 2009. Many significant environmental issues at the site still exist.
- An area of mercury contamination in soil has been confirmed at the site and groundwater is contaminated with chlorinated solvents.
- Recommendations for next steps include: retaining a New Jersey Licensed Site Remediation Professional to oversee environmental assessment and remediation; developing a work plan for the next phase of assessment; conducting the next phase of assessment and a pre-demolition survey; and development of a remedial action workplan for soil and groundwater contamination.
- Redevelopment plans for the site will likely need to include engineering and institutional controls to mitigate potential for exposure to any residual contamination at the site.

Introduction

This memo provides a summary of environmental case file documents reviewed for the Camden Laboratories site, located at 1667 Davis Street, Camden, NJ 08103 (Block 1392, Lot 33). 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. The current owner of the site is Camden Laboratories, LP, a non-public entity. Camden Laboratories, LP formerly had a Memorandum of Agreement (MOA) with the NJDEP regarding remediation of site contamination; however, the MOA was cancelled as of May 7, 2012 with the full implementation of the Site Remediation Reform Act of 2009, N.J.S.A. 58:10C-1 et seq. (SRRA). The site currently has no Licensed Site Remediation Professional (LSRP) of record.

BRS, Inc. completed a review and made electronic copies of all available NJDEP case files for the site at the NJDEP Office of Record Access in Trenton, NJ on May 9, 2014. A list of files accessed by this review is attached to this memorandum. This memo provides a summary of information gathered from review of these files.

Site Description and Background

The site is located in the Whitman Park neighborhood of South Camden, NJ on an irregularly-shaped parcel approximately 3.56 acres in area. The surrounding area is predominantly residential with areas of industrial and commercial development to the east. The Whitman Park, including a recreational playground and ball field, adjoins the site directly to the south and east.

Approximately two-thirds of the parcel is covered by asphalt-paved parking areas and a vacant compound of institutional buildings with a building footprint of approximately 50,000 square feet. The compound of buildings consists of contiguous one and two story structures with a partial basement. The structures are in extremely poor condition and subject to vandalism and illegal dumping. The remaining portions of the site consist of unpaved areas.

The site was originally developed for use by the City of Camden in the early 1920's as the Camden Municipal 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). The original hospital buildings were subsequently demolished and the laboratory buildings currently located on site were built in various phases between the 1950's to 1980's. The site was purchased by its current owner, 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.

Prior to 1989, the site used three (3) underground storage tanks (UST) to provide fuel for generators and boilers located within the Camden Laboratories buildings. The tanks included two (2) 6,000-gallon No. 2 fuel oil USTs and one (1) 2,000-gallon No. 2 fuel oil UST. The USTs were closed and removed from the site in 1989. The facility then converted to a natural gas heating system. A 275-gallon above ground storage tank (AST) was located on site in 2007 to service an outdoor emergency generator.

Although all drainage systems, including a network of floor drains at the buildings are reportedly connected to the Camden County Municipal Utilities Authority (CCMUA) sewer system, development at the site includes an out-of-service on-site septic system at the north portion of the site on Davis Street. A geophysical survey of the septic system identified an anomaly assumed to be the system's 10,000-gallon septic tank. Other subsurface utilities identified at the site include stormwater and/or sewer lines, natural gas lines and electrical conduit.

Other former systems at the site associated with prior operations of the laboratories include an electrical substation with two on-site dry non-PCB transformers powered by overhead lines; an incinerator for the disposal of animal carcasses (no longer present at the site); a hydraulic lift located at a loading dock at the center of the site; and a dry well located beneath former boiler rooms.

The site formerly housed a New Jersey Ambient Air Monitoring station as part of a network operated by NJDEP to monitor air quality throughout the state of New Jersey. The "Camden Lab" air monitoring station operated between 1968 and 2008.

History of Environmental Remediation

The site has been subject to environmental investigation and remediation under the oversight of the NJDEP since 1989. The various phases of investigation and remediation include the closure of the three (3) fuel oil USTs in 1989; a Preliminary Assessment in 2007 by Environmental Resolutions Inc.; a Preliminary Assessment, Site Investigation, and Remedial Action Workplan in 2008 by CMX, LLC; and a Supplemental Site Investigation by CMX in 2009. No additional environmental investigation or remediation has been completed at the site since completion of the 2009 Supplemental Site Investigation. Per the documentation reviewed from the NJDEP files, a total of sixteen (16) environmental areas of concern (AOC) have been identified at the site in the environmental reporting.

Following the submittal of the PA/SI/RAW in August 2008 and following a subsequent on-site meeting conducted in November 2008 with the NJDEP case management team, a representative of the site ownership, and the environmental consultant (CMX), NJDEP issued a Notice of Deficiency (NOD) in December 2008 to Camden Laboratories, LP. The NOD provided findings of "No Further Investigation Required" for ten (10) AOC including the on-site septic system, former incinerator, former hydraulic lift and former dry well, and required additional investigation and/or remediation at the following six (6) AOC:

AOC 1: 275-Gallon Fuel Oil Aboveground Storage Tank

Although previous investigation of the immediate area around the exterior AST that supplied fuel for the emergency generator located at the southern portion of the property had indicated no signs of contamination, evidence of a possible surface soil spill from the AST as a result of vandalism was identified during the November 2008 site visit.

AOC 2: Former No. 2 Fuel Oil Underground Storage Tanks

NJDEP required post-remediation soil samples to be collected from each of the three (3) former 1989 UST excavation areas and submitted for appropriate laboratory analysis. Two of the UST excavations, including one of the 6,000-gallon USTs (Tank A) and the 2,000-gallon UST (Tank C) were located on the north portion of the site. The third excavation from the other former 6,000-gallon UST (Tank B) was located on the south portion of the site.

AOC 3: Storage Containers

Storage containers, including four (4) empty 55-gallon muriatic acid drums and five (5) empty 55-gallon caustic soda drums that were previously identified on-site were ordered to be removed and disposed off-site with disposal receipts of all storage containers submitted to NJDEP.

AOC-13: Liquid Nitrogen Spill

In November 1998, the Camden County Department of Health and Human Services (CCDHHS) responded to a release of liquid nitrogen and evaporative gasses at the site (NJ Spills Database Listing NJDEP Case No. 98-11-20-1919-54). A subsequent September 1999 "File Completion Memo" from CCDHHS indicated that the conditions of the release had been adequately mitigated. NJDEP required that the CCDHHS documentation be provided for review.

AOC-14: Groundwater

In the 2008 Site Investigation Report, CMX stated that chlorinated solvent ground water contamination had been identified on the Camden Laboratories property and has been attributed to migration of contaminants originating from the RF Products site (NJDEP PI # 015474), an industrial facility located north and east of the Camden Laboratories.

According to CMX's reporting, the NJDEP Site Remediation and Waste Management Program, Division of Remediation Support, Bureau of Environmental Measurement and Site Assessment conducted ground water investigations to evaluate the RF Products site as a potential source of contamination identified in the nearby Camden Parkside Well Field, a source of municipal drinking water. The NJDEP findings were summarized in an Expanded Site Investigation Report dated September 2007. According to the report, TCE was identified at concentrations exceeding the NJDEP Groundwater Quality Standards in ground water beneath the RF Products site and the Camden Laboratories property. The NJDEP concluded that the RF Products site was the source of the TCE ground water contamination and that the TCE ground water contamination has migrated to the Camden Laboratories property from the RF Products site. Depth to ground water at the time of the NJDEP ground water investigation was identified between thirty-two (32) to forty-one (41) feet below grade.

CMX collected one groundwater sample during the 2008 Site Investigation at the Camden Laboratories property. The sample was analyzed for volatile organic compounds (VOC) and base neutral (BN) compounds and found not to contain any levels of contamination above NJDEP groundwater cleanup standards. No other groundwater samples collected at the site or information about groundwater quality at the site has been identified.

In the December 2008 NOD, NJDEP indicated that a NJDEP geologist would review file information for the RF Products site as well as other adjoining sites to determine if the source of the reported contamination on the Camden Laboratories property had its source at one or more of the adjoining sites. NJDEP also required that construction details of the on-site septic system, dry well, and hydraulic lift be provided to assist in determining an on-site source for groundwater contamination. NJDEP also indicted that a vapor intrusion investigation would be required for future site improvements.

AOC 16: Mercury

Prior to the November 2008 site meeting, NJDEP informed the consultant (CMX) for Camden Laboratories, LP of an event in April 2004 when elevated levels of mercury vapor were measured at the site by an NJDEP team installing equipment associated with the "Camden Lab" New Jersey Ambient Air Monitoring Station formerly located on the site. The Bureau of Environmental Evaluation & Risk Assessment (BEERA) reviewed the mercury vapor data and did not identify any potential mercury sources on the NJDEP SRP Known Contaminated Sites List (KCSL) in the area. BEERA therefore concluded that the mercury air readings identified along the western perimeter of the NJDEP air monitoring station may be the result of a mercury surface spill on the Camden Laboratories property. NJDEP required additional investigation of soils in this area to identify the mercury source.

2009 Supplemental Site Investigation

To further investigate the six (6) AOC as required by NJDEP in the December 2008 NOD, the consultant (CMX) for Camden Laboratories, LP conducted a Supplemental Site Investigation between December

2008 - January 2009, which included additional site reconnaissance, records research and the collection and analysis of soil samples. According to the 2009 Supplemental Site Investigation Report, sufficient evidence was developed by the investigation for CMX to request a finding of "No Further Action" from NJDEP for AOC 1 (275-Gallon Fuel Oil Aboveground Storage Tank), AOC 2 (Former No. 2 Fuel Oil Underground Storage Tanks), AOC 3 (Storage Containers), AOC 13 (Liquid Nitrogen Spill), and AOC 14 (Groundwater).

To investigate the area of the suspected mercury soil spill, CMX installed sixteen (16) soil borings to depths ranging between four (4) feet to twenty-five (25) feet below grade (fbg). Field screening indicated that mercury vapor was present at a majority of the soil borings advanced. Soil samples analyzed for mercury reported levels as high as 3,700 mg/kg, exceeding the residential direct contact NJDEP Residential Direct Contact Soil Remediation Standard (RDCSRS) of 23 mg/kg, by more than two orders of magnitude. It should be noted that samples were biased away from areas of high levels of mercury vapor in an attempt to delineate the contaminated area within the soil profile; therefore the highest levels of soil contamination by mercury were not sampled or analyzed.

According to CMX, the area of mercury contamination was horizontally and vertically delineated to the NJDEP RDCSRS. The estimated area of mercury contaminated soil measures twenty-four (24) feet in length by thirty-four (34) feet in width and extends to a maximum depth of twenty-three (23) fbg. The volume of mercury contaminated soils is estimated to be 500 - 700 cubic yards or approximately 750 – 1000 tons.

There is no indication that the Supplemental Site Investigation Report was ever reviewed or approved by a NJDEP Case Manager.

Conclusions and Recommendations for Further Actions

As per the requirements of the Site Remediation Reform Act of 2009, N.J.S.A. 58:10C-1 et seq. (SRRA) and the NJDEP Technical Requirements for Site Remediation, N.J.A.C 7:26E, the person responsible for remediating the Camden Laboratories site is obligated to hire a Licensed Site Remediation Professional (LSRP) to continue and complete the remediation. According to information provided by NJDEP on its website, no LSRP of record is currently listed for the Camden Laboratories site.

As the CRA's re-use strategy for this site includes recreation, continued environmental investigation and remediation to achieve a Response Action Outcome (RAO) for either the entire site or specific areas of concern will be required; based on the information reviewed for this assessment, additional environmental investigation is warranted. Such activities may include investigation of soil and groundwater including the installation of soil borings and temporary and/or permanent monitoring wells. Demolition or partial demolition of existing structures may be expedient to complete investigation and remediation and prepare for site re-use.

The confirmed presence of mercury at elevated levels exceeding NJDEP cleanup standards should be considered a significant environmental condition for this site, particularly for site re-use considerations as recreational if that use includes playgrounds. Mercury is highly toxic to human health, posing a particular threat to the development of the child in utero and early in life.

The potential presence of chlorinated solvent contamination in site groundwater may also pose elevated risks to potential users of the site, though the reported depth to groundwater mitigates threats of migration

of organic vapors into current or future structures at the site. A vapor intrusion study will be required should elevated levels of organic constituents be identified in groundwater beneath the site.

It should also be noted that there is no record in the NJDEP case file reviewed for this assessment of any environmental investigation including environmental risks typically associated with former or active biological and medical laboratories. This facility is known to have processed, stored and disposed of wide ranges of animal and human tissue and blood samples. Further, these types of facilities may use and store broad categories of chemical and radioactive materials. No inventory of hazardous materials or Material Safety Data Sheets (MSDS) associated with the former laboratories has been accessed for this assessment. Future environmental investigation of this facility may require evaluation of these environmental hazards.

The protection of childcare centers and schools from exposure to environmental contamination, such as those identified by this assessment, has been established as a priority policy of the State of New Jersey and the NJDEP. Contaminated sites to be used for educational purposes, such as private schools, public schools, or charter schools, are subject to the "Madden Law", N.J.S.A. 52:27D-130.4. In addition to completing the NJDEP investigation and remediation requirements as per the Technical Requirements for Site Remediation, N.J.A.C 7:26E, additional requirements of other state agencies including the New Jersey Department of Children & Families, Department of Health, and the Department of Community Affairs may apply. In most cases a full-site RAO must be issued prior to obtaining Certificates of Occupancy and/or construction permits for the educational facility.

To complete the investigation and remediation with a goal to receive an RAO for either the entire site or specific areas of concern, an LSRP must be engaged to review the existing environmental record, including the Supplemental Site Investigation Report to determine what additional remedial actions are required. A scope of work to complete this final phase of investigation and remediation would include the following:

1. LSRP Retention and SRRA compliance including submission to NJDEP of Annual Remediation Fee Form, Initial Receptor Evaluation and Public Notification requirements.
2. Review of environmental case files pertaining to the site, including NJDEP, USEPA and local governing agencies to include review of case files associated with the RF Products site.
3. Completion of a Remedial Investigation Workplan (RIW) for soil and groundwater including Case Inventory Document (CID), site-specific Quality Assurance Project Plan (QAPP) and Health and Safety Program. The RIW should also include requirements for a vapor study if required by groundwater findings and a pre-demolition survey to identify and quantify the various hazardous waste streams that would be generated by demolition of the existing buildings and subsurface structures.
4. Following the completion of the Remedial Investigation and Pre-Demolition Survey, a Remedial Action Workplan (RAW) may be developed to implement the final phase of remedial action required at the site in conformance with expected site re-use goals. If final remediation includes the use of engineering or institutional controls such as capping or a Groundwater Classification Exception Area (CEA), remedial permits, long-term biennial inspections and certifications, and deed restrictions may be required.
5. Engineering controls may need to be incorporated into subsequent design elements for new construction at the site, such as vapor barriers and mercury ambient air monitoring systems.

Camden Laboratories, 1667 Davis Street, Camden
NJDEP Case File Document Inventory

Date	Document Type	Prepared By	Prepared For	Comments
10/1988 - 10/ 1989	UST Registration and Removal Documents	Coriell Institute for Medical Research/ Camden Laboratories, LP	NJDEP	Various standard reporting forms and reporting documents regarding the registration and closure of the three (3) fuel oil underground storage tanks (USTs).
11/20/1998	Emergency Response Incident Report	Camden County Dept. of Health and Human Services (DHSS)	File Document	Standard file document regarding a release of liquid nitrogen at the facility.
09/15/1999	File Completion Memo	Camden County Dept. of Health and Human Services (DHSS)	File Document	Standard file document regarding a release of liquid nitrogen at the facility.
12/13/2005	Regulatory Correspondence	NJDEP	Camden Laboratories, LP	A request for access to the facility by NJDEP to conduct groundwater sampling in connection with a region-wide investigation of groundwater quality.
10/25/2007	File Completion Memo	Camden County Dept. of Health and Human Services (DHSS)	File Document	Standard file document regarding a release of diesel fuel at the facility.
08/01/2008	Site Investigation Report	CMX (Environmental Consultant to Camden Laboratories, LP)	Camden Laboratories, LP	Standard report per NJDEP requirements to document results of a site investigation conducted at the facility between 2007 and 2008.

Camden Laboratories, 1667 Davis Street, Camden
NJDEP Case File Document Inventory

Date	Document Type	Prepared By	Prepared For	Comments
09/05/2008	Application for Memorandum of Agreement	CMX (Environmental Consultant to Camden Laboratories, LP)	NJDEP	Standard application form for a Memorandum of Agreement between NJDEP and Camden Laboratories, LP.
09/23/2008	Area of Concerns Tracking Sheet	NJDEP	File Document	Internal tracking document used by NJDEP Case Managers
11/19/2008	Site Inspection Report	NJDEP	File Document	Standard file document used by NJDEP case managers and technical staff to report site inspections and on-site meetings.
12/03/2008	Regulatory Correspondence	NJDEP	Camden Laboratories, LP	Notice of Deficiency regarding the August 2008 Site Investigation Report and other related documents.
02/25/2009	Supplemental Site Investigation Report	CMX (Environmental Consultant to Camden Laboratories, LP)	Camden Laboratories, LP	Standard report per NJDEP requirements to document results of a site investigation conducted at the facility between 2008 and 2009.
12/21/2011	Regulatory Correspondence	NJDEP	Camden Laboratories, LP	Standard form letter sent by NJDEP to inform responsible parties of their obligations under the SRRA to hire an LSRP to complete investigation and remediation of their facility.

Camden Laboratories, 1667 Davis Street, Camden
NJDEP Case File Document Inventory

Date	Document Type	Prepared By	Prepared For	Comments
01/05/2012	Correspondence	Taenzer, Ettenson, Stockton & Aberant	NJDEP	Letter from former counsel for Camden Laboratories, LP informing NJDEP that they are no longer associated with the site.

Mt. Ephraim Brownfield Area-Wide Plan
Brownfield Prioritization Summary

Site ID	Site Name (if applicable)	Neighborhood	Street Address	Descriptive Location (if no address)	Block	Lot	Ownership	TAB prioritization score	Additional Points for location in Choice Neighborhood	Total Prioritization Score	Ranking
23	Camden Labs	Whitman Park	1667 Davis St		1392	33	Camden Laboratorie	22	3	25	Primary Catalyst Site
11	1814-1820 Mulford St	Centerville	1814-1820 Mulford St		556	43, 44, 45, 89	Camden City	20	3	23	Second-Tier Site
16	1700 Mt Ephraim Ave	Whitman Park	1700 Mt Ephraim Ave		1363	83	Camden Redevelopr	19	3	22	Second-Tier Site
9	1744 Mulford St	Centerville	1744 Mulford St		553	34	Camden City	17	3	20	Second-Tier Site
12	Centerville Revitalization	Centerville		Florence St btwn 7th/8th and 9th/10th Streets	570	17	Camden Redevelopr	19	0	19	Future Redevelopment Opportunity
21	RF Products	Whitman Park	1605 Thorne St		1386	1.01	Foursome LLC	16	3	19	Primary Catalyst Site
22	Phil-Mar	Whitman Park	1800 Copewood St		1388	7	Phil-Mar Industries	16	3	19	Primary Catalyst Site
6	SS Jackson 87 W of 9th St	Liberty Park		SS Jackson 87 W of 9th St	444	33	Camden City	17	0	17	Future Redevelopment Opportunity
1	1572 S 10th St	Liberty Park	1572 S 10th St		440	99	Respond, Inc	16	0	16	Second-Tier Site
20	Pro-Build	Whitman Park	1601 Thorne St		1386	1	RF Products	13	3	16	Future Redevelopment Opportunity
15	BDF Industrial Fasteners	Whitman Park	1360 Whitman Ave		1348	31	Holy Trinity Intl Mini	14	0	14	Future Redevelopment Opportunity
18	SS Browning 170 E Pershing	Whitman Park		SS Browning 170 E Pershing	1378	19	Wilson, Arthur T	11	3	14	Future Redevelopment Opportunity
2	SW 9th and Lansdown Ave	Liberty Park		SW 9th and Lansdown Ave	417	4	First Nazarene Bapti	13	0	13	Future Redevelopment Opportunity
8	SW Corner of Sheridan and Mar	Liberty Park		SW Corner of Sheridan and Marylind Streets	453	42	Chinn, W	13	0	13	Future Redevelopment Opportunity
10	1816 S 10th St	Centerville	1816 S 10th St		555	11	Ferguson, H	10	3	13	Future Redevelopment Opportunity
14	Harry Pape & Sons	Whitman Park	1427-9 Haddon Ave		1336	43	Unity Community Ce	13	0	13	Future Redevelopment Opportunity
17	1801-1811 Norris St	Whitman Park	1801-1811 Norris St		1370	35	GSVJMW, Inc	10	3	13	Future Redevelopment Opportunity
19	Charlie & Sons Service Ctr	Whitman Park	1503 Haddon Ave	SW corner of Haddon and Crestmont Ave	1381	24	Chomiczewski, Char	12	0	12	Future Redevelopment Opportunity
4	1030-1032 Everett St	Liberty Park	1030-1032 Everett St		432	44	Joseph Seward	11	0	11	Future Redevelopment Opportunity
5	NW Lowell and Warsaw St S	Liberty Park		NW Lowell and Warsaw St S	440	82	GSVJMW INC	10	0	10	Future Redevelopment Opportunity
13	1198 Lansdown Ave	Whitman Park	1198 Lansdown Ave		1328	1	Orlando Rolon & Sor	10	0	10	Future Redevelopment Opportunity
3	927 Everett St	Liberty Park	927 Everett St		420	61	Onuoha Cajetan O	9	0	9	Future Redevelopment Opportunity
7	NS Carl Miller 273 E 10th	Liberty Park		NS Carl Miller 273 E 10th	449	2	Hollis, Steven	9	0	9	Future Redevelopment Opportunity

Brownfield Site Redevelopment Prioritization Criteria
Camden Mt. Ephraim Brownfield Area-Wide Plan

Site # **Site Name:**

Location	**Score**
Is the site readily accessible by major transportation mode (rail, highway, and/or water)? yes=1 point no=0 points	
Does the site have the potential of being clustered with adjacent properties? yes=3 point no=0 points	
Physical Site Characteristics	
Is the site vacant (no structures present)? yes=1 point no=0 points	
Environmental Considerations	
Contamination * *(only one criteria can apply)*	
Has a site assessment been *completed* resulting in no known contamination? 3 points	
Has the site remediation been *completed* ? 3 points	
If site remediation has not been completed or even started, has a Remedial Action Work plan been prepared and approved by the NJDEP and/or certified by a LSRP? 2 points	
Has a site assessment been *completed* resulting in known contamination (but remediation plan has *not* yet been approved/certified)? 1 point	
Is site contamination unknown, or is a site assessment underway (not yet completed)? 0 points	
Is the site listed on the National Priorities List (Superfund)? 0 points	
Is the property under a federal or state enforcement action? 0 points	
Other Constraints	
Is the site located within a floodplain? yes=0 points no=1 point	
Are there wetlands present on the site? yes=0 points no=1 point	
Is the site or structures on the site listed on either the National or State Register of Historic Places? yes=0 points no=1 point	
Planning Considerations	
Is redevelopment of the site for economic purposes inconsistent with regional plans (e.g., DVRPC Connections Plan)? no=1 point yes=0 points	
Is redevelopment of the site for economic purposes inconsistent with state plans (e.g., New Jersey Energy Master Plan)? no=1 point yes=0 points	
Is redevelopment of the site for economic purposes consistent with The City of Camden Master Plan? yes=2 point no=0 points	
Is redevelopment of the site for economic purposes consistent with an existing Neighborhood Redevelopment Plan, Neighborhood Plan or Redevelopment Project as designated for review by the City of Camden? yes=2 point no=0 points	
Is the site specifically mentioned in an existing Neighborhood Redevelopment Plan, Neighborhood Plan or Redevelopment Project as designated for review by the City of Camden in a manner consistent with economic redevelopment? yes=2 point no=0 points	
Ownership	
Is the site owned by a public entity (municipality, county or state)? yes=6 points no=0 points	
If the site is not owned by a public entity, is an agreement in place with the property owner? Yes=2 points no=0 points	
Total Score:	

Brownfields Area-Wide Planning Program

EPA United States Environmental Protection Agency

Introduction

The Environmental Protection Agency (EPA) created the Brownfields Area-Wide Planning (BF AWP) Program to assist communities in responding to local brownfields challenges, particularly where multiple brownfield[1] sites are in close proximity, connected by infrastructure, and overall limit the economic, environmental and social prosperity of their surroundings. Through the BF AWP Program, EPA provides assistance to advance community brownfield revitalization efforts. The BF AWP program is part of the Partnership for Sustainable Communities collaboration among EPA and the Departments of Transportation (DOT) and Housing and Urban Development (HUD). (www.sustainablecommunities.gov)

Brownfields Area-Wide Planning Program Goals

EPA developed the BF AWP Program to enhance EPA's core brownfields assistance programs[2] by helping communities perform the research needed to develop an area-wide plan for brownfields assessment, cleanup, and reuse. The resulting area-wide plans provide direction for future brownfields cleanup, reuse and related improvements that are:

- Protective of public health and the environment;
- Economically viable; and
- Reflective of the community's vision for the area.

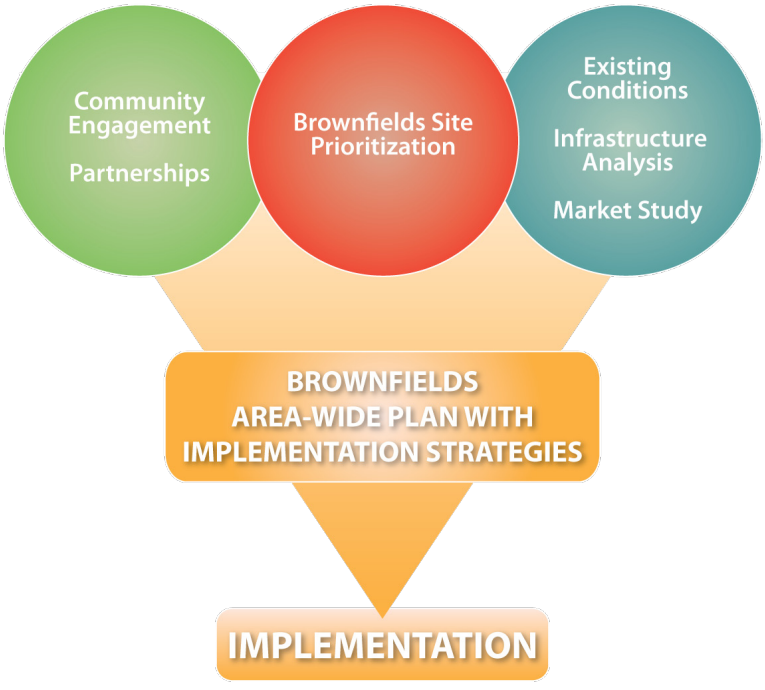
EPA's Brownfields Area-Wide Planning Program

Initiated in 2010, the BF AWP Program provides grant funding and technical assistance to brownfields communities selected via a national grant competition. These communities are using EPA resources to research area-wide planning approaches that will help them achieve brownfields cleanup and reuse in the future. The BF AWP grant recipients represent a cross section of community leaders on brownfield issues, include public and non-profit organizations, and are distributed across the country. Find more information at www.epa.gov/brownfields/areawide_grants.htm. EPA expects to award additional BF AWP grants as funding is available.

Core Elements of Brownfields Area-Wide Planning

Core elements of the BF AWP Program include:

- Collecting information and identifying community priorities related to brownfields cleanup and near- and long-term revitalization;
- Evaluating existing environmental conditions, local market potential, and needed infrastructure improvements;
- Developing strategies for brownfields site cleanup and reuse; and
- Identifying resources or leveraging opportunities to help implement the plans, including specific strategies for public and private sector investments and improvements necessary to help with cleanup and area revitalization.



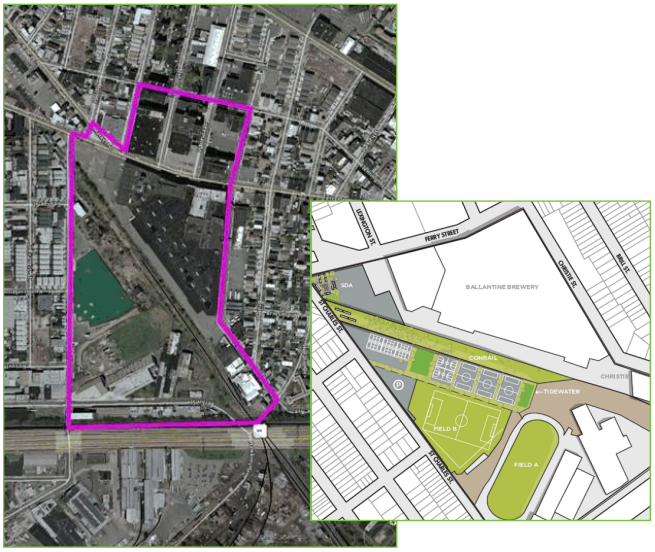
1 A brownfield is a property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. See www.epa.gov/brownfields/basic_info.htm

2 Please visit www.epa.gov/brownfields/grant_info/index.htm

Types of Brownfields Area-Wide Planning Research Activities

- **Project Area Definition** – BF AWP areas are typically established within a local commercial corridor, neighborhood, city block, downtown district, or other geographically-defined area that has a single large or multiple brownfield sites.
- **Community Engagement** – Meaningful and continuous community engagement is fundamental to BF AWP. Stakeholders include residents, businesses, government, community-based organizations, nonprofits, and any potential future partners. Engagement can be facilitated through advisory committees, public meetings, design charrettes, round table sessions, and other means to gather community priorities for area cleanup and reuse.
- **Partnerships** – BF AWP should reflect diverse perspectives on community priorities and shared responsibility for implementation across multiple entities. Partnerships typically include government agencies, institutional or community-based organizations, local or regional funding providers and the private sector. Long-term collaboration amongst partners helps ensure the interests voiced in the community engagement process are applied throughout the life of the project and facilitates implementation of the area-wide plan.
- **Brownfields Site Prioritization** – Prioritization allows for strategic use of limited resources. It can be customized to meet the unique needs and goals of the community identified through the community engagement process. Criteria may include proximity to sensitive populations, property size, human or environmental health threats, likelihood of reuse, availability of other resources, or potential to catalyze additional improvements within the project area.
- **Existing Conditions** – Establishing the local physical, social, economic, and environmental context on which to base the plan allows stakeholders to: identify priorities, partnerships, and general needs for the area; informs a detailed opportunities and constraints analysis;

The vision for cleanup and redevelopment of brownfields is driven by local community priorities, market demand, and area-wide investments in New Bern, North Carolina



Ironbound Community Corporation, New Jersey brownfields planning area and site reuse concepts

Meaningful community engagement like this meeting in Huntington Park, California, allows the plan to reflect community priorities

and begins the process of identifying resources for implementation. For example, proposed projects requiring private market investment and development may benefit from economic research or market studies to identify what the local real estate market can support. Similarly, identifying the extent to which a project will require public subsidies is critical to determine project feasibility. Brownfields cleanup and reuse strategies need to be directly tied to the infrastructure that supports the sites, including roads, water, sewer, power, and telecommunications, if revitalization plans are to be realized. Examining the adequacy of infrastructure is important when developing strategies for leveraging the use of existing infrastructure— or identifying if upgrades are needed given the planned reuse.

- **Brownfields Reuse Planning for Catalyst Sites** – Through the process of identifying the community's priorities and existing conditions of the project area, the BF AWP process helps uncover specific opportunities where communities can assess, clean up and reuse high-priority, or catalyst, brownfield sites. These sites may have the strongest potential for reuse due to community interest, environmental, health or economic concerns, and/or ability to spur additional revitalization within the project area. The brownfields area-wide plan should summarize the cleanup and reuse implementation strategies for these catalyst sites using information obtained through research into community engagement, prioritization, existing conditions, partnerships, and potential resources.

- **Implementation Strategy** – Identifying and evaluating potential technical or financial resources at the local, regional, state, tribal, and federal levels are critical steps for the realization of BF AWP goals. EPA encourages strong coordination with other federal, state, tribal, regional and local agencies to share relevant information and help leverage technical assistance and resource opportunities. Implementation strategies must also consider partnerships, market-based feasibility of redevelopment plans, and short- and long-term actions to achieve full-scale implementation.

Brownfields like this in Ranson, West Virginia, are part of the city's BF AWP project area and targeted for cleanup and revitalization

Mobile community engagement in San Francisco tours the planning area for close inspection

Public and private partners in Kansas City, Missouri, look at a key brownfields site and work together to develop a strategy to implement the BF AWP vision

Developing Action-Oriented Brownfields Area-Wide Planning with Short- and Long-Term Implementation Considerations

The BF AWP process is meant to help communities organize the short-and long-term actions that they need to take to achieve the cleanup and reuse goals for the project area. Often times, economic limitations (such as financial resources and market conditions) and local policy challenges can prevent a brownfields area-wide plan from being implemented immediately. However, the process should help a community recognize that taking initial or interim steps can keep momentum behind the project. For example, a community can work to integrate the plan across local government departments, into partnership priorities or into regional planning efforts. Additionally, pursuing interim cleanup and reuse at brownfields sites can also help demonstrate to the community that their priorities are being addressed, even before the full brownfields remedy and reuse are achieved.

Relationship of Brownfields Area-Wide Planning to Existing Community Planning Efforts

BF AWP does not replicate or replace traditional planning efforts such as city-wide comprehensive, regional land use, or neighborhood planning. Rather, the research and strategies developed through BF AWP can be used to inform these more traditional planning process so they are complementary and account for the unique nature of brownfield cleanup, reuse, and the social, environmental, and economic implications that differentiate them from unencumbered property. For example, some community planning efforts assume relative uniformity across properties within a particular area – that all properties are equally reusable, relatively unconstrained, and any development limitations are influenced only by local policy (such as zoning). These planning efforts do not always account for the impact that real or potential contamination associated with brownfields has on these assumptions.

Conclusion

EPA's BF AWP program outlines an approach which enables communities to research and evaluate brownfields cleanup and reuse opportunities in light of priorities and existing plans; local market, infrastructure, and other conditions; and resource availability. This information enables communities to make more informed decisions about where to direct scarce resources and helps advance the implementation of locally-driven initiatives, such as housing, parks, environmental improvement, economic development, and ensuring environmental justice.

Ohio River Corridor Brownfields Area-Wide Planning study area in Monaca, Pennsylvania

The BF AWP process is especially helpful to communities that have already been working within a specific area to develop partnerships, engage the community on priorities and build agreement around a shared revitalization vision.

As available, EPA provides assistance to brownfields communities for BF AWP in order to help identify specific cleanup and reuse opportunities for key brownfield sites that can serve as catalysts for revitalization of the surrounding area.