



599 Springfield Avenue, Berkeley Heights, NJ 07922

February 5, 2014

Gregory S. Franz
Borough Administrator
Borough of Edgewater
Bergen County, New Jersey
55 River Road, Edgewater NJ 07020

RE: Summary Report
PCB contamination/Case # 13-10-03-1252-52
Veterans Field
Edgewater, NJ

Dear Mr. Franz:

TERMS Environmental Services, Inc. (TERMS) prepared this letter summarizing the investigation results validation meeting and anticipated remedial workplan requirements to address the PCB contamination related to the above referenced site.

A meeting was held on 1-24-2014 with Mr. Daibes, Mr. Ferguson, Yourself, representatives of Neglia and TERMS to review the results of the validation data. At the meeting TERMS presented our revised Figure and results with the revised data showing the extent of the contamination. Essentially the areas and the volume to be remediated had not changed from the previous estimate of 25,000 cubic yards. It was agreed upon by all that the validation data is acceptable as presented.

During the meeting, the only area that was disputed made by the representatives of Waterside was in regards to the soils beneath the northern parking lot. Waterside's contention was that this was a "cut" area and no material was imported to this location. Based on the soil samples collected in this area, the volume of soil to be remediated was estimated to be 1,875 cubic yards. Waterside accepted the responsibility for the remaining volume of PCB contaminated soil identified at the site. Waterside indicated that they were qualified to perform the "excavation/construction" activities related to remediation. Waterside also requested that a revised volume of PCB impacted soil be calculated based on remediating to 10 mg/kg for a cap and Turf installation proposal.

TERMS believes there is sufficient evidence to document that the PCB material detected in the northern lot Area of Concern is a result of excavating, disturbance and/or paving activities performed in this area of the site. TERMS also suggested that additional samples could be collected in this area to confirm the volume and characterization.

Although the Mayor and Council subsequently directed TERMS to focus on the workplan to complete the remediation to the residential standard of 0.2 mg/kg. Based on the contractor's recommendation/request, we had already done a rough calculation of the volume of that would require remediation based on cleaning up to 10 mg/kg PCB concentration. For informational purposes, our preliminary rough calculation revealed a volume of 8,500 cubic yards.

As directed to do by the Mayor and Council. TERMS prepared a full Remedial Action Workplan (RAW) and also provided this RAW summary. The proposed remediation calls for excavation, proper disposal and post excavation verification sampling of all previously identified soil with PCB concentrations above the residential standard of 0.2 mg/kg.

In addition, TERMS has provided several budgetary and time estimates below, since this information is not appropriate to include in the RAW in order to comply with the specific regulatory format.

RAW Summary

1. TERMS will consult with the representatives for the Borough of Edgewater, New Jersey to determine whether the northern parking lot Area of Concern, which Waterside contends is not their responsibility, should be addressed separately. If additional sampling is to be performed, the investigation and results will require approximately three weeks to complete.
2. The USEPA Toxic Substances Control Act (TSCA) provides federal PCB remediation policy that must be coordinated with Site Remediation Program policy during PCB remediation projects. The full Remedial Action Workplan (RAW) will be submitted to the EPA. The EPA review and response period for the RAW is 30 days.
3. The Company retained to perform remediation will provide the actual schedule and costs for construction/excavation activities to remove & load out 25.000 cy waste, which will need to include/address the following:
 - a. Soil Erosion Plan and Engineering Controls.
 - b. The entire site will be encompassed by silt fence, impacted areas will be covered in plastic and soils being remediated will be sprayed with water to control dust and mitigate exposure.
 - c. An exclusion zone, tracking pad and decontamination area will be established.
 - d. Site Restoration will require the replacement of filter fabric/demarcation barrier, Quarry Supplied Certified Clean Fill for cap. Supplying **Pre Approved Top Soil (Where required by contract documents)** and leveling the entire park to final grade.
4. TERMS will provide the Health and Safety Oversight.
 - a. A Site/Activity Specific Health and Safety Plan (HASP) will be developed by TERMS to ensure the protection of the health and safety of all persons involved with the PCB soil investigation/remediation. Adherence to the procedures outlined in this HASP will also assure the protection of the general public while these activities are carried out.
 - b. Community Air Monitoring Program (CAMP) maintained by TERMS.

5. TERMS will provide the Environmental Oversight for Remediation.
- a. The required cleanup level will be performed utilizing the Self Implementing Option (40 CFR 761.61(a)): as a high occupancy area (HOA). (estimated 8 weeks)
 - b. Manifested Waste by licensed carriers and disposed of at TSCA-approved facility. (T&D estimated at \$185.00/Ton). For informational purposes the daily cost for excavation/load out should be approximately \$5,000/day. Please note that actual costs will need to be obtained from the contractor(s) who will ultimately be performing the PCB remediation.
 - c. Verification sampling of PCBs will be performed after remediation to assess achievement of remediation goals as described in Subpart O (40 CFR 761.260). (Minimum of 450 Post Excavation samples - PCB Metal Pest PAH)
 - d. Report preparation and issuance of the Response Action Outcome (RAO) for the PCB area of concern

Should you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,
TERMS Environmental Services, Inc.

A handwritten signature in blue ink, reading "Ronald Dooney". The signature is written in a cursive style with a long, sweeping tail on the final letter.

Ronald Dooney, LSRP
President