



599 Springfield Avenue, Berkeley Heights, NJ 07922

October 18, 2013

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:

Per your request, TERMS Environmental Services, Inc. (TERMS) prepared this letter summarizing the activities performed and anticipated workplan requirements to address the PCB contamination related to the above referenced site.

BACKGROUND

The site was undergoing a soil remediation project designed to cover historic fill soils with a clean fill cap. During this process, it appears that PCB contaminated soil/crushed concrete was imported to the site.

It was reported that several loads of fill material were imported to the site and placed prior to analysis and approval. As these activities were performed on unscheduled work days, the source of this material could not be confirmed and the amount imported or placement locations could not be verified.

INITIAL INVESTIGATIONS

Samples from three (3) piles of this suspect material, which were not spread, were collected and analyzed. Sample results revealed that PCB concentrations ranged from 100 mg/kg to 450 mg/kg. These piles were visually classified as crushed concrete.

In order to determine the potential extent of contamination, several locations, in which recent construction activities occurred, were tested. The results of this preliminary investigation point to three basic types of impacts.

1. Crushed concrete with elevated PCB levels of 100-450 mg/kg utilized as base material for concrete sidewalks and cement pads. These levels and appearance were consistent with the tested piles and indicated that the concrete was the highest PCB level source.
2. A combined concrete, soil and other aggregate characterization. This material was utilized as lift material on the field and under paved areas. These impacts ranged from 10 mg/kg-350 mg/kg with the average PCB concentration in the 50 mg/kg range. These concentrations suggest that the contaminated concrete source material was blended with previously approved clean soils or additional amounts of moderately contaminated soils/aggregate were imported.
3. Surface impacts resulting from cross contamination from construction activities. The multiple placement sites, several crushing and sifting operations combined with vehicle traffic and material movement increased the potential for spread of contaminants.

REMEDIAL INVESTIGATION/CLASSIFICATION

On October 15 and 16, 2013, representatives from TERMS were present on site to further investigate and verify these findings. Over one hundred soil samples were collected as a requirement to classify the site. Soil borings were advanced in previously identified areas in an effort to determine the horizontal limits of contamination. Additional soil samples were collected adjacent to the known impact areas in order to assist in vertical delineation. Soils visually identified to contain suspect material were also tested. Areas that appeared not to be visually impacted were also tested to verify the contamination limits.

The laboratory results of this investigation are due on October 25, 2013. The results of this investigation will be reviewed to determine if additional investigation sampling is required.

REMEDIAL INVESTIGATION/ACTION WORKPLAN

Upon receipt of the final investigation/delineation sample results TERMS will develop a Remedial Action Workplan (RAW) to address this issue in accordance with NJDEP and EPA rules, regulations and guidance. The EPA review period for the RAW is 30 days. The proposed remediation will recommend excavation of all identified soil with PCB contamination and proper disposal of this soil.

NJDEP GUIDANCE

NJDEP Spill case 13-10-03-1252-52 has been assigned.
The NJDEP PCB Coordinator Kevin Schick has been contacted.
The NJDEP soil cleanup criteria for PCB's is 0.2 mg/kg

EPA RULES AND REGULATIONS PCB Remediation Waste (40 CFR 761.61):

The EPA regional James Haklar has been contacted.

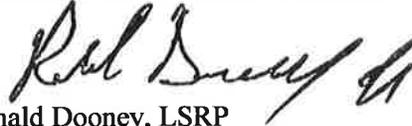
The USEPA Toxic Substances Control Act (TSCA) provides federal PCB remediation policy that must be coordinated with Site Remediation Program policy during PCB remediation projects. This coordination often will allow for and in fact require permanent remediation of PCBs dependent on future use and concentrations detected. TSCA stipulates a range of self-implementing cleanup levels based upon future high and low occupancy scenarios that are identified in 40 CFR 761.61(a)4.

These self-implementing remediation scenarios fall within PCB soil contamination ranges from 1 to 100 ppm. Where concentrations above 100 ppm are present or where the occupational use requirements will not be met, risk-based disposal approval proposals must be submitted to the USEPA and a written response must be received before proceeding. All PCB-contaminated wastes with greater than or equal to (\geq) 1 ppm PCBs would have to be removed from the site and disposed of at a TSCA-PCB permitted facility. Post excavation sampling will be performed to verify the success of the remediation.

In accordance with the TERMS October 3, 2013 letter, TERMS is continuing to require that no site operations resume until such time that we can complete our assessment of the extent of the affected area and develop a Workplan to address the proper removal. During this time period any areas that are determined to be impacted will be covered in plastic to mitigate exposure and the Community Air Monitoring Program (CAMP) will continue.

TERMS appreciates the opportunity to propose our environmental consulting services to The Borough. 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 black ink, appearing to read "Ronald Dooney", with a stylized flourish at the end.

Ronald Dooney, LSRP
President