



October 31, 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 investigation results and anticipated remedial 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, untested and non-approved soil/crushed concrete was imported to the site.

Preliminary characterization samples were collected and analyzed from this suspect material. The sample results revealed that this material contained Polychlorinated Biphenyl (PCB) concentrations in excess of NJDEP and USEPA levels. The material has been classified as Bulk Remediation Waste per 40 CFR 761.61. The PCB concentrations levels detected have specific investigation and remediation requirements which must be adhered to. In addition, PAH and Pesticides were also detected in excess of NJDEP limits.

In order to determine the potential extent of contamination, locations in which recent construction activities occurred were tested. Soil borings were advanced and soil samples collected in an effort to ascertain the vertical and horizontal limits of the PCB contamination.

## **REMEDIAL INVESTIGATION**

The results of October 15/16, 2013 investigation revealed that several areas of the park have been impacted. PCB concentrations were detected up to levels of 450 mg/kg, the NJDEP limit is 0.2 mg/kg. The sample locations/results and the known impacted areas are depicted in Figure 1. Summary laboratory analysis has also been provided as an attachment.

To date, these initial results indicate that an estimated minimum volume of 27,000 cubic yards of soil has been impacted with PCB contamination. Please note that the vertical and horizontal limits have not been completely delineated.

In order to assist in further defining the volume of contaminated soil to be remediated and comply with EPA and NJDEP requirements, additional investigation samples will be required to be collected and analyzed for PCB, Metals, PAH and Pesticides parameters. This investigation is scheduled for next week.

## **REMEDIAL ACTION WORKPLAN**

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. The EPA review and response period for the RAW is 30 days.

While the results of the initial investigations have not completely delineated the extent of contamination, the data has provided sufficient information to develop a preliminary work plan. Based on the PCB concentration levels detected and the future use of the site, a Self Implementing Option will be proposed. TERMS will provide the LSRP services, oversight of the project and prepare the Remedial Action Report.

In order to satisfy Federal, State and Local guidelines, TERMS prepared this Self Implementing Option RAW summary and outline. This RAW summary provides the tasks and procedures to achieve EPA, NJDEP, OSHA and Township of Edgewater NJ compliance. The NJDEP PCB Coordinator Kevin Schick and the EPA regional representative James Haklar have been contacted. Representatives from the Township of Edgewater, Neglia Engineering and Waterside Construction have been provided copies of this summary letter.

### **RAW Summary**

Based on the information acquired to date, TERMS is continuing to require that the park remain closed and no site operations resume. Additional precautions have been and will continue to be implemented to mitigate exposure and the Community Air Monitoring Program (CAMP) will be maintained. The Notification and Public Outreach fact sheet has also been updated.

The initial step per EPA regulations is to characterize and identify all potentially impacted areas. Additional investigations are scheduled to be performed in order to define the areas that require remediation. All PCB-contaminated wastes greater than or equal to the NJDEP limits of 0.2 mg/kg will be removed from the site.

Due to the type and level of contaminants detected, the RAW will require that qualified personnel perform the remedial activities in order to minimize health risk and further spreading of contamination. An environmental remediation firm, that has experience in performing similar operations, will be selected and approved by all pertinent parties to perform the cleanup.

The PCB contaminated soil/concrete will be properly removed from the site, manifested by licensed carriers, and disposed of at a TSCA-PCB permitted facility.

Post excavation sampling will be performed to verify the success of the remediation. Due to the nature of the contaminant source, it is very likely that several hot spot remediation locations may require additional remediation. Upon completing the remediation to the required criteria, site restoration will include manifested Quarry Supplied Certified Clean Fill and leveling the entire park to final grade.

## RAW Outline

1. A Health and Safety Plan (HASP) will be developed 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.
  - a. Qualified, Certified and Experienced personnel will perform activities.
  - b. Proper Personal Protective Equipment (PPE) and Engineering Controls will be utilized.
  - c. 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 mitigate exposure.
  - d. An exclusion zone, tracking pad and decontamination area will be established.
  - e. Community Air Monitoring Program (CAMP) maintained.
  
2. A Conceptual Site Model (CSM) will be designed as the initial step in developing a sampling plan for characterization. This model will identify all possible sources of PCBs, their release mechanisms, and classes of remediation waste potentially impacted.
  - a. Characterization sampling to assess the nature and extent of PCB impacted materials will be performed as described in Subpart N (40 CFR 761.260).
  - b. All sampling will be performed in accordance with the latest version of the NJDEP's Field Sampling Procedures Manual and the Technical Requirements for Remediation of Contaminated Sites (N.J.A.C. 7:26 E et al).
  - c. Core samples will be performed in accordance with 40 CFR 761.286.
  
3. The proposed remediation calls for excavation, proper disposal and post excavation verification sampling of all previously identified soil with PCB contamination above the NJDEP's Impact to Groundwater Standard (IGWS) 0.2 mg/kg.
  - a. The required cleanup level will be performed utilizing the Self Implementing Option (40 CFR 761.61(a)): as a high occupancy area (HOA).
  - b. Manifested Waste disposed at TSCA-approved facility.
  - 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).
  - d. Site Restoration will require the replacement of filter fabric/demarcation barrier, Quarry Supplied Certified Clean Fill and leveling the entire park to final grade.

The Remedial Action Workplan will be submitted for review and approval upon receipt of the delineation samples results and completion of the CSM.

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

Sincerely,  
**TERMS Environmental Services, Inc.**



Ronald Dooney, LSRP  
President

## Health and Safety Summary Sheet

Per the NJDEP Technical Regulations, this Fact Sheet has been prepared to update the Notification and Public Outreach requirement for sites undergoing an environmental investigation /remediation.

**Fact Sheet Prepared: October 30, 2013**

**Name of Site: Veterans Park**

**Address of Site: 1167 River Road, Edgewater, Bergen County, New Jersey.**

**Tax Block(s)/Lot(s): Block 30, Lot 1.**

**NJDEP Case Number: 13-10-03-1252-52**

### Introduction

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.

Preliminary characterization samples were collected and analyzed from this suspect material. The sample results revealed that this material contained Polychlorinated Biphenyl (PCB) concentrations and additional contaminants in excess of NJDEP and USEPA levels.

#### Contaminants of Concern as of 10-31-2013

#### NJDEP LIMITS

##### PAH

Benzo[a]anthracene - 19 mg/kg	0.5 mg/kg
Benzo[b]fluoranthene - 18 mg/kg	2.0 mg/kg
Benzo[a]pyrene - 15 mg/kg	0.2 mg/kg
Indeno(1,2,3-cd)pyrene - 6.8 mg/kg	5.0 mg/kg
Dibenzo(a,h)anthracene -2.3 mg/kg	0.5 mg/kg

##### Pesticides

cis-Chlordane - 0.101 mg/kg	0.03 mg/kg
Heptachlor epoxide - 0.029 mg/kg	0.009 mg/kg
trans-Chlordane- 0.103 mg/kg	0.03 mg/kg
Dieldrin - 0.18 mg/kg	0.003 mg/kg

##### PCB

Total Aroclor - 458 mg/kg	0.2 mg/kg
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The routes of exposure are inhalation, ingestion and direct contact.

Online resource for chemical information/material safety data sheets: [www.hazard.com/msds/](http://www.hazard.com/msds/)

Contact information of person responsible for conducting remediation:

TERMS Environmental Services, Inc.  
599 Springfield Avenue  
Berkeley Heights, New Jersey 07922

(908) 464-0028

(908) 464-6255 FAX

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