



The Township of Hamilton

Jeffrey S. Martin
Mayor

November 29, 2021

Michael S. Regan, Administrator
US Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Regan:

Enclosed please find an application for an EPA Brownfields Cleanup Grant for the former Nearpara Rubber Factory site located at 1849 East State Street, Block 1636, Lot 4, Hamilton Township, Mercer County, New Jersey.

1. Applicant Identification: Hamilton Township (Municipality)
2090 Greenwood Avenue
P.O. Box 00150
Hamilton, NJ 08650-0150
2. Funding Requested:
 - a. Grant Type: Single Site Cleanup Grant
 - b. Federal Funds Requested: \$500,000, no cost share waiver
3. Location: Hamilton Township, Mercer County, New Jersey
4. Property Information:
Former Nearpara Rubber Company Property
1849 East State Street
Block 1636, Lot 4
Hamilton Township, Mercer County, New Jersey

Census Tract Block 29.02 Block Group 4 and part of Census Tract 28 Block Groups 2 & Census Block Group ID#s 340210029024, 340210028002, 340210028003

5. Contacts:
 - a. Project Director:
Robert C. Poppert, PP, AICP, Supervising Planner
Division of Planning, Department of Community & Economic Development
2090 Greenwood Avenue
P.O. Box 00150
Hamilton, NJ 08650-0150
Phone: (609) 890-3674
Fax: (609) 890-3548
rpoppert@hamiltonnj.com

b. Chief Executive:
 Jeffrey S. Martin, Mayor
 Hamilton Township
 2090 Greenwood Avenue
 P.O. Box 00150
 Hamilton, NJ 08650-0150
 Phone: (609) 890-3507
 mayor@hamiltonnj.com

6. Hamilton Township Population: 92,297

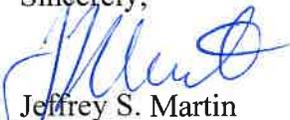
7. Other Factors Checklist:

Other Factors	Page #
Community population is 10,000 or less.	n/a
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	n/a
The proposed brownfield site(s) is impacted by mine-scarred land.	n/a
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	Included Narrative Page # 3
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	n/a
The proposed site(s) is in a federally designated flood plain.	n/a
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures	The Township encourages green building and offers incentives to developers that incorporate them into redevelopment plans.

8. Letter from the State or Tribal Environmental Authority: Please see attached letter from NJ Department of Environmental Protection (NJDEP).

I am excited about the opportunity that this grant will provide to Hamilton Township and look forward to a favorable response. Thank you for your consideration.

Sincerely,



Jeffrey S. Martin
 Mayor, Hamilton Township

cc: Senator Booker, Senator Menendez and Congressman Smith

Cover Letter Attachment 1
Other Factors Checklist

**Hamilton Township
Other Factors Checklist**

Other Factors	Page #
Community population is 10,000 or less.	n/a
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	n/a
The proposed brownfield site(s) is impacted by mine-scarred land.	n/a
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	Letter from NJEDA/NJDEP Enclosed and described in Narrative Page # 3
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	n/a
The proposed site(s) is in a federally designated flood plain.	n/a
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy	The Township encourages green building and offers incentives to developers that incorporate them into redevelopment plans.
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	The Township encourages green building and offers incentives to developers that incorporate them into redevelopment plans.
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.	n/a

Cover Letter Attachment 2
Letter from NJ State Environmental Authority



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
SITE REMEDIATION AND WASTE MANAGEMENT PROGRAM
OFFICE OF BROWNFIELD & COMMUNITY REVITALIZATION

401 East State Street

P.O. Box 420, Mail Code 401-05k

Trenton, New Jersey 08625-0420

www.nj.gov/dep

PHILIP D. MURPHY

Governor

SHEILA Y. OLIVER

Lt. Governor

SHAWN M. LATOURETTE

Commissioner

October 21, 2021

The Honorable Michael S. Regan
Administrator
US Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

RE: Support of USEPA Brownfield Cleanup grant for Former Nearpara Rubber Site,
1849 East State Street, Hamilton Township, Mercer Co., NJ

Dear Administrator Regan:

On behalf of the New Jersey Department of Environmental Protection (NJDEP), I am endorsing the Township of Hamilton application to the United States Environmental Protection Agency (USEPA) for a Brownfield Cleanup Grant for the former Nearpara Rubber Factory, 1849 East State Street, Hamilton Township, Mercer Co., NJ (Block 1636, Lot 4) to conduct site investigation and remediation activities associated with discharges of hazardous substances and petroleum products.

The NJDEP acknowledges that the applicant plans to conduct a cleanup at this site and has developed an aggressive and sound strategy to identify, assess, and remediate this abandoned brownfield. A grant request in the amount of \$246,001 has been submitted for review for consideration for an NJDEP Hazardous Discharge Site Remediation Fund (HDSRF) grant. The Department has found the proposal to be technically eligible for funding and has recommended the New Jersey Economic Development Authority (NJEDA) obligate a grant in the amount of \$246,001 for the proposed work at the site.

Please accept this letter of support for the Township of Hamilton Brownfield Cleanup Grant application and contact me if I may be of further assistance.

I may be reached at (609) 633-1223 or William.Lindner@dep.nj.gov.

Sincerely,



William J. Lindner, Administrator
Office of Brownfield & Community
Revitalization

Cc: Marcia Blackwell, VHB
Honorable Martin, Mayor



**Narrative, in Response to
Ranking Criteria (10 pages)**

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Background and Description of Target Area

The Target Area known as the “Bromley Neighborhood” (Bromley), occupies 1,400 acres within Hamilton Township, NJ (Township). The Township, directly adjacent to the City of Trenton, is experiencing similar impacts to its environment and demographics as other major cities with 35 known or potential brownfields. Bromley’s history dates back to the late 18th century when the area was home to the NJ State Fairgrounds, Anderson Farm, Fashion Stud Farm, and Woodlawn Amusement Park. Later, Bromley became a reflection of America’s expanding industry and a well-developed suburb of Trenton, but when the factories began closing in the mid-20th century, there was nothing driving Bromley forward. The abandoned buildings and economic loss caused property values to plummet, and homeowners began renting properties with little attention paid to upkeep. In the mid-1960s, riots and severe social unrest resulted in “white flight” and further degradation of the area.

Demographics in Bromley closely reflect those of the City of Trenton, NJ’s State Capital. The NJ Department of Environmental Protection (NJDEP) Environmental Justice (EJ) Mapping Tool classifies the area as an Overburdened Community where 45% of the population is considered Low Income and 81% are Minority. Bromley is identified as an EJ community which will benefit from cleanup and redevelopment.

Bromley shows signs of disinvestment, and faces the challenges of addressing blight, high vacancy rates, and a weakened local economy. However, Hamilton Township is committed to improving conditions in Bromley. Bromley has many strong assets including a core of homeowners, churches, and schools, the Municipal Hall, proximity to two train stations, some local employment, the Grounds for Sculpture museum and arboretum, commercial centers, and parks, all which bode well for redevelopment.

ii. Description of the Brownfield Site(s)

Nearpara Rubber (Nearpara) occupies a 2.99-acre property, where recycling and production operations impacted the site with hazardous materials, petroleum products, volatile organic and base neutral compounds, pesticides, polychlorinated biphenyls (PCBs) and heavy metals. Nearpara was at one time a thriving employer, but is now a blighted, contaminated property, adversely impacting soil, groundwater, ecological receptors and the surrounding community.

Manufacturing operations at Nearpara began in the early 1920s and involved feeding rubber into a cracker mill, then heating with a water and oil solution. Water and dilute caustic were pumped into a settling reservoir which discharged to the sanitary sewer. Odor complaints and discharge violations occurred through the 1980s. The NJDEP filed an appeal to revoke the company’s operating permit in 1983 as documented in the *Trenton Times* article entitled “NJDEP may close smelly plant” which describes concerns raised by the community.

Nearpara was ordered closed by the federal bankruptcy court in 1992. Circa 1993, an NJDEP Communications Center Notification Report noted various chemicals abandoned at the site. Gates were locked, workers were unpaid, and 800,000 tires were abandoned. An environmental report at the time documented the presence of underground storage tanks (USTs), aboveground storage tanks (ASTs), air permits with the NJDEP, an NJDEP discharge to groundwater permit and a Township sanitary sewer permit. Violations to the air permits and sanitary sewer permit were reported. The report also referenced seven Areas of Concern (AOCs): 1) Leaking gasoline UST; 2) Transformer leakage; 3) Railroad siding loading dock; 4) AST Farm; 5) Discharge from blade grinders; 6) Discharge from a settling reservoir; and 7) Groundwater contamination. Two production wells when sampled in January 1985 reported trichloroethylene. Volatile organic compounds and base neutral compounds were reported in the groundwater above applicable standards.

The United States Environmental Protection Agency (USEPA) became involved in 1989 when the NJDEP

requested assistance. The USEPA reported petroleum hydrocarbons and organic sulfur compounds being emitted into the atmosphere and groundwater. According to the USEPA report, there were eight public wells within a 3 to 4 mile radius of the Nearpara facility. The USEPA report referenced 1,1,2-trichloroethane, ethylbenzene, benzene, bis(2-ethylhexyl) phthalate, and naphthalene contamination. NJDEP transferred the site/file to the USEPA which conducted a \$935,000 emergency removal action in 1994-1995 to address immediate environmental concerns. Contaminants removed by the USEPA included solvents, solvent sludge, lead-containing grease and sludge, waste oil, caustics, lab reagents and PCBs. A USEPA memo noted 150 containers of hazardous materials, nine ASTs, four USTs, 150,000 cubic feet of tires, 11 transformers, compressed gas cylinders and 50 containers of laboratory chemicals. The USEPA posted asbestos warning signs, secured and locked the site.

A Certificate of Sale for unpaid municipal liens in 1996 transferred ownership of Nearpara to the Township. Environmental reports since that time identified three abandoned buildings and AOCs including: ASTs; USTs; rail spur; aboveground pump station; sumps; loading/unloading areas; storage area – drums; storage area – coal; chemical storage cabinets; floor drains and trenches; roof leaders; waste piles; electrical transformers; underground piping; pits; surface impoundments; industrial production wells, boiler room; air vents; hazardous dust; asbestos-containing material; lead-based paint; and monitoring wells with floating product.

The Nearpara site is heavily contaminated with chemicals discharged during the former manufacturing process, including leaking drums and tanks, and petroleum products used to fuel equipment and operations. Surrounding Nearpara are densely populated urban areas consisting of residential, commercial and industrial properties. Contamination is present in abandoned drums, USTs, ASTs, drain systems, surface impoundments and stockpiles of soil. Contamination is impacting soil, groundwater, and may be creating vapor hazards. The project area and community would realize substantial benefits from environmental cleanup of this highly contaminated brownfield site.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

Nearpara is located in a light industrial/warehouse zone, consistent with the Township's 2010 Master Plan, which was created with extensive community input. The site is located in an EJ community and within a federally designated Opportunity Zone (OZ), which are indicators of the municipal need and the Township's desire to attract developers and investors. The property sits in both the Arts & Culture District Overlay Zone and a Redevelopment Area; both provide development options beyond those permitted in the underlying industrial zone. The Township's 2020 Master Plan Update encourages the redevelopment of brownfields and underutilized sites through marketing and/or rezoning.

Recognizing that Bromley was starting to show signs of disinvestment, the Township applied in 2007 for a Building Livable Communities Grant to conduct the Bromley Neighborhood East State Planning Initiative. The planning initiative, coordinated by Isles, Inc. and PlanSmartNJ, identified priorities, responsible parties and potential funding sources. The purpose of the planning initiative was to identify a community vision and priorities whereby stakeholders identified issues and objectives for the neighborhood in the following categories: Public Safety; Land Use and Sense of Community; Local Businesses; Parks and Public Spaces; Transportation and Infrastructure; and Youth. The Township has a history of promoting economic development opportunities and routinely works with organizations whose missions are consistent with the Township's development goals. The Township applied for a USEPA Cleanup Grant for Nearpara in Fiscal Year 2021 and while not awarded, a debrief was held and the Township was encouraged to reapply.

Environmental cleanup at Nearpara will have a significant impact on the Target Area including protecting human health, the environment and spurring redevelopment at nearby abandoned and dilapidated sites. To ensure that the end use improves environmental quality, proposed redevelopment applications will be

reviewed by the Health Department and Environmental Commission before presentation to the Planning Board. Since the cleanup plan will be integrated with site redevelopment, the NJDEP will also be consulted. The Township pledges to hold quarterly community meetings for the project term to offer interested developers opportunities to present and discuss redevelopment plans. Several local developers, as a result of the recent clearing of vegetation, have expressed interest in discussing redevelopment options once remediation is complete. As part of the Community Engagement Plan, the public will be asked for their comments and suggestions on site reuse.

ii. Outcomes and Benefits of Reuse Strategy

Environmental remediation and redevelopment at Nearpara will improve the health and economics of this overburdened community by increasing employment, rehabilitating property, expanding the tax base and increasing property values. The Township will work with its partners to track data for completion of required reports as per the negotiated work plan with USEPA. The Township will monitor the redevelopment of the site and coordinate with new owners/developers to evaluate the number of jobs created, the total value of leveraged funding, the total acreage of brownfields redeveloped, and the anticipated number of people impacted by remediation of the site. The Township will maintain files to ensure public accountability and transparency of data collection and measurement activities. The proposed cleanup activities are anticipated to have a significant positive impact on Bromley by reducing health risks and exposure to environmental contaminants, increasing tax revenue, creating new jobs, drawing new business into the area and increasing civic pride.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

The Township intends to leverage the financial commitment from the NJDEP Hazardous Discharge Site Remediation Fund (HDSRF) with the requested USEPA grant funds and apply Community Development Block Grant (CDBG) resources in addition to municipal personnel time. An HDSRF grant was awarded in October 2021 for \$241,501 to be used for Site Investigation and Remedial Investigation. The Township has used CDBG money to perform clearing of vegetation from the site to allow for the geophysical survey and remedial tasks. Additional CDBG funds in the amount of \$150,000 have been set aside for Remedial Action items not covered by USEPA and HDSRF; some will cover building demolition. After soliciting public input, the Township will work in parallel with the cleanup process to find an appropriate developer for the site. The Township will also seek the assistance of USEPA’s Technical Assistance to Brownfields (TAB) provider, NJ Institute of Technology (NJIT) to leverage redevelopment options.

ii. Use of Existing Infrastructure

Redevelopment at Nearpara will be driven by policies supportive of sustainable development. The project will reuse the Township’s existing infrastructure; a framework of gas, sewer, water, and electric utilities. Future site use will benefit from the Target Area’s proximity to the network of roadways, interstate highways and rail stations. The Hamilton “Interstate Highway Complex” has afforded the Township an advantage over other municipalities in attracting new business and offers superior access to the rest of the county, state and east coast markets. Site redevelopment will comply with strict stormwater ordinances and employ best practices of green design. No additional infrastructure is needed for the redevelopment.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. The Community’s Need for Funding

i. When faced with brownfield vacancies, the Township is unable to generate tax revenue or recover lost tax revenues from the sale of municipally-owned brownfields as the properties are difficult to sell. Current economic conditions and the Township’s high density have created a demand for a wide range of social and economic services per taxable area, while the Township foregoes tax revenue annually from more than 100 brownfield sites. Nearpara exemplifies the community’s need for brownfield funding as the site has been environmentally impaired and vacant for more than 29 years.

The location of the Nearpara site in an OZ and designation as an EJ community confirms the need for USEPA grant funding. As the Township acquired the site through tax delinquency, it must clear and remediate the site, and transfer ownership of the property to a developer at a deflated price and/or through tax abatement as a means of incentivizing redevelopment. If a site such as Nearpara cannot be cost effectively remediated, the Township’s ability to market the property for redevelopment is severely limited.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

The Bromley Neighborhood is comprised of nearly 6,000 residents, 83% of which are either black or Hispanic. Between 2009 and 2014, the white population dropped by half, from 1,519 to 723, and stabilized in the 2019 American Community Survey (ACS). Meanwhile, the black population nearly doubled, from 1,820 to 3,610. The area is also comprised of a growing Hispanic community of nearly 25% of the population. Like much of the surrounding area, Bromley experiences a high poverty rate, with nearly 20% of families living below the poverty line, of which two-thirds are made up of female households (no husband present) with children under 18 years old. This poverty rate is compared to 8% county-wide. At \$46,632 the median household income is significantly below average, and about 70% lower than the other households in Hamilton Township, Mercer County and NJ. Nearpara and Bromley are listed in Census Tract Block 29.02 Block Group 4. Parts of Bromley are also located in Census Tract 28 Block Groups 2 & 3.

The high rate of poverty in Bromley compounds the health issues of the sensitive populations and affects a wide range of resources that diminish quality of life. Bromley has comparatively larger numbers of children, pregnant women, minority groups and low-income populations. As reinforced by the data, sensitive populations are adversely impacted by environmental issues and disproportionately affected by brownfields in comparison to non-sensitive populations and residents of larger geographic areas. The presence of Nearpara and other brownfield sites in the Target Area suggests a correlation between exposure to hazardous substances, and the higher incidences of cancer, asthma, and other health factors.

USEPA EJ Index for Target Area	State %tile	EPA Reg %tile	USA %tile
EJ Index for PM2. 5	86	84	83
EJ Index for Ozone	87	85	84
EJ Index for NATA* Diesel PM	82	75	86
EJ Index for NATA* Air Toxics Cancer Risk	85	81	82
EJ Index for NATA* Respiratory Hazard Index	84	78	82
EJ Index for Traffic Proximity and Volume	89	83	89
EJ Index for Lead Paint Indicator	92	89	96
EJ Index for Superfund Proximity	70	71	83
EJ Index for RMP Proximity	85	87	85
EJ Index for Hazardous Waste Proximity	85	73	91
EJ Index for Wastewater Discharge Indicator	88	92	91

Demographic Index for Target Area from USEPA EJ Screen	1 mile Radius of Site	State Avg.	%ile in State	EPA Region Avg.	%ile EPA Region	USA Avg.	%ile in USA
People of Color Population	81%	44%	81	44%	77	39%	84
Low Income Population	45%	24%	84	29%	78	33%	73
Linguistically Isolated Population	17%	7%	86	8%	83	4%	91
Less Than High School Educ.	24%	10%	87	13%	83	13%	84
Population Under 5 years of age	8%	6%	72	6%	71	6%	69
Population over 64 years of age	11%	16%	33	16%	31	15%	34

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

The prevalence of brownfields near residential neighborhoods and schools contributes to the disproportionate rates of asthma and other health affects as exposure to harmful substances is a major risk factor, especially among children and other sensitive populations. Public health impacts data was gathered from the NJ Department of Health (NJDOH) and Trenton Health Team <https://trentonhealthteam.org> include: **Asthma:** 9.5% of adults in Mercer County have asthma higher than the statewide average. 8.7% of children in NJ currently have asthma. **Lead:** The County is comprised of 3.5% of NJ children under the age of three with an elevated blood lead level during 2014, 45% higher than the State average. One of the sources of lead in Mercer County are brownfields which are suspected/known to have lead contamination, as well as Bromley's housing stock (many units 80+ years old), which pre-dates the lead-based paint ban of 1978. Per USEPA EJ Index for Lead Paint Indicator, the Target Area is in the 92 percentile for the State. Lead levels increased by 29% in 2020 because of children staying home during the COVID-19 pandemic. **Low Birth Weight (LBW):** The LBW rate in Mercer County is 8%. LBW disproportionately impacts minorities, who are 13% more likely to deliver LBW infants. Given that the Target Area is 81% minority, this is particularly worrisome. **Cancer:** Mercer County residents suffer from invasive cancer with a 6% greater incidence rate than the NJ average and 15% greater than the US. Cancer is the second leading cause of death in NJ.

(3) Promoting Environmental Justice

Nearpara is located within an EJ community that will directly benefit from cleanup and redevelopment by increasing access to job opportunities, increasing property values and eliminating disinvestment. The population surrounding the site is disproportionately impacted by the environmental conditions because of the industrial history of the Target Area. Twenty percent of the Bromley population lives below the poverty line, and in NJ 18.6% of low income residents are without health insurance. The uninsured are significantly more likely to be in poor health and to have unmet medical needs. Bromley residents are dually impacted by the negative socioeconomic and environmental impacts of brownfields. Residents of Bromley face low property values, high taxes, and increased risk of health conditions related to air, water and soils contaminated by historic operations. Environmental cleanup of the site will reverse the decay in the neighborhood, decrease health risks and promote civic pride, encouraging adjacent property owners and residents to upgrade their properties and structures.

b. Community Engagement

i. Project Involvement

The NJDEP requires all sites undergoing environmental investigation/remediation in the State to identify sensitive populations around the site (such as daycare centers, schools, residential properties or playgrounds) and to provide public notification regarding proposed cleanup. Signs will be posted at the site in English, Spanish, and (if needed) other languages, notifying people of the project and providing a contact for additional information. A designated contact person, the retained Licensed Site Remediation Professional (LSRP)/Environmental Consultant (EC), will be made available to answer any technical questions citizens may have regarding cleanup activities.

At the Township level, the public will be engaged through a designated community engagement representative. This individual will work through relevant entities including the Township's Environmental Commission to keep residents aware of the project status. At the neighborhood level, the Township's community engagement representative will work through the Bromley Neighborhood Civic Center and Isles, Inc., whose mission is to foster self-reliant families and healthy, sustainable communities, to ensure public input on potential reuse of the site and address their concerns regarding how remediation is being conducted. All environmental documents relating to remediation will be made available at a designated location at the Township's Municipal building. The Township's Health Department will provide input on health-related issues.

The future of the Township and Bromley is dependent upon reclaiming derelict properties such as Nearpara. As such, staff time committed to this effort will include multiple Township departments as reflected in the chart below. In addition, the Township intends to consult with NJIT TAB Communities and Rutgers University, to leverage technical assistance.

ii. Project Roles

Name of Organization/Entity	Point of contact	Specific Involvement Assistance Provided
Bromley Neighborhood Civic Center (Community Partner)	Thomas G. Mladenetz, Director TMLadenetz@cyomercer.org; 609.883.1560	Community Education, Outreach, Reuse Planning, Community Meeting Location
Isles, Inc. (Community Partner)	Michael Nordquist, Community Planning & Development, mnordquist@isles.org; 609.341.4716,	Community Education, Outreach. Connections with Community and Faith Based Groups; Reuse Planning
Hamilton Township Health Department	Kathleen Fitzgerald, RN, BSN, Director KFitzgerald@HamiltonNJ.com; 609.890.3686	Health Related Issues, Regulatory Compliance
Hamilton Township Environmental Commission	John H. Balletto, Chair, jhballetto@gmail.com; 609.581.3643	Community Education, Outreach, Reuse Planning
Hamilton Township Fire District #4	Richard Kraemer, Chief; Rkraemer@htfd6.org; 609.585.7600	Site Safety, Community Education, Outreach

iii. Incorporating Community Input

The Township held its first community meeting regarding Nearpara and the USEPA grant on October 15, 2020. The public meeting was advertised in the *Trenton Times*, the *Trentonian*, on the Township’s website and via the Township’s E-newsletter, Facebook page and Twitter feed. Detailed meeting minutes including questions and answers were posted on the Township’s website. A second community meeting was held on October 25, 2021 and advertised in the newspaper, via email and posted flyers in the community center. The meeting was attended by the Township’s LSRP/EC, interested citizens, municipal officials, and members of the environmental commission. Meeting minutes including questions and answers were posted on the Township’s website.

Upon notification of a USEPA grant award, the Township will implement a community engagement plan (as per Task 2) including hosting a public meeting to share detailed plans and timeline of the cleanup process which will be advertised and posted as above. Community Partners will assist in sharing the meeting dates/times with residents and soliciting public input. Meetings on environmental progress and site reuse will be held quarterly or more frequently when necessary. The Township’s Supervising Planner and LSRP/EC will be available to receive comments and answer questions. Meeting minutes including questions and answers will be posted on the Township’s website. The Township will maintain files to ensure public accountability and transparency of data collection and measurement activities. Pertinent documentation will be housed in an electronic repository on the Township’s website and hard copy files will be made available for inspection at the Planning Office. The public will be notified of the meetings via a notice in the newspaper, Township eblast, Township social media pages, flyers posted at the Bromley Community Center and the Township website. These tasks will be conducted in accordance with the Community Relations Plan.

In the event that in-person meetings are not possible due to social distancing or other restrictions as a result of COVID-19, the Township will offer virtual meetings via Zoom or a similar platform. Pertinent

documentation will be housed in an electronic repository on the Township’s website and hard copy files will be made available for inspection at the Planning Office. The Public will be notified of the meetings via a notice in the newspaper, Township eblast, Township social media pages and the Township website. These tasks will be conducted in accordance with the Community Relations Plan identified below in Task 2.

3.TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

The proposed Cleanup Plan outlines the scope of work for oversight and removal of leaking drums, storage tanks, waste piles, and contaminated soil stockpiles documented at the property in a May 2019 Preliminary Assessment (PA) report. The Cleanup Plan will be detailed in a Remedial Action Workplan (RAW) and site-specific health and safety plan (HASP). Prior to removal, USTs, ASTs, tanks, drums, waste piles, and contaminated soil stockpiles, will be assessed to determine appropriate handling, loading, transportation, and offsite disposal procedures. Post remedial action soil sampling will be conducted to verify the effectiveness of each removal action. Laboratory data will be evaluated using a Quality Assurance/Quality Control (QA/QC) process and compared to the NJDEP Remediation Standards. Hazardous materials will be transported offsite and disposed at facilities licensed to accept the material. The empty USTs, drums, ASTs, and contaminated soil will be removed from the property and transported to licensed facilities. Following the remedial actions, the remedial investigation of groundwater will be continued, and an ecological evaluation will be conducted using HDSRF funds. The Township will negotiate off site access with surrounding property owners, as needed.

b. Description of Tasks/Activities and Outputs

Task 1 - Programmatic Management, Engineering Oversight, and Report Preparation
i. Program management tasks include project planning, work plan development, scheduling and coordination of tasks, and subcontractor management. Engineering oversight will include field supervision, sample collection, coordination of offsite disposal, and monitoring site activities. Review of field reports, laboratory analytical data, and preparation of remedial action reports (RAR) will be completed in accordance with NJDEP requirements and guidance documents. Activities will be supervised, and deliverables certified by an LSRP/EC. Coordination between the Township, LSRP/EC, and USEPA will be managed under this task. To assist, the Township will procure and provide diligent oversight of a professional environmental grant management consultant to meet environmental and grant requirements; perform grant budget and contractor invoice tracking, compliance, and reporting activities; and assist with community outreach. The grant management firm will be retained in accordance with all federal, state, and local procurement requirements.
ii. Anticipated Project Schedule: Project Duration
iii. Task/Activity Lead(s): Robert Poppert, PP, AICP, Supervising Planner, Hamilton Township
iv. Output(s): The outputs from this task will include ACRES updates; quarterly reports, MBE/WBE reports, and financial reports submitted; RAWP, QAPP, SAMP, Bid Request/RFP, RAR
Task 2 – Community Engagement
i. Project Implementation: Public Engagement includes development and implementation of a Community Relations Plan, (with consultant assistance) posting of signs at the site describing the work in progress and a contact for additional information, and the establishment of a public repository. This task includes a budget for travel, parking fees, coordination of community meetings and visits with neighboring businesses and interested groups to discuss the ongoing work and redevelopment plans. The Township will work with the community to obtain input and provide information about program implementation. This engagement may be in person, virtual, or a hybrid, depending on COVID restrictions and which method is expected to provide the greatest participation. The Township will be assisted in community outreach activities as described in Task 1 , which will be competitively retained in accordance with all federal, state, and local procurement requirements.
ii. Anticipated Project Schedule: Project Duration

iii. Task/Activity Lead(s): Robert Poppert, PP, AICP, Supervising Planner, Hamilton Township
iv. Output(s): Public Engagement/Community Relations Plan, public notices, public meetings, meeting agendas and minutes, website updates, social media postings, signs at the site.
Task 3 – Disposal of Drums, ASTs, Waste Piles, and Solid Waste
i. Project Implementation: This task includes disposal of ASTs, USTs, 55-gallon drums, transit containers containing rubber materials, and several waste piles containing rubber materials. Laboratory analytical data will be evaluated to assess disposal options and to develop a materials management plan. Waste disposal will meet federal Resource Conservation and Recovery Act (RCRA) guidelines and NJDEP Division of Solid and Hazardous Waste requirements. Waste characterization will be conducted using the approved HDSRF grant funds. The LSRP/EC will evaluate the data and determine if additional characterization is required and the appropriate disposal options for each waste stream. This task includes plan development, subcontractor management, field management of loading operations, and review and approval of waste manifests which will be catalogued for inclusion with USEPA and NJDEP reporting.
ii. Anticipated Project Schedule: 1 st and 2 nd Quarter 2023
iii. Task/Activity Lead(s): Robert Poppert, PP, AICP, Supervising Planner, Hamilton Township, Environmental Consultant, Subcontractors
iv. Output(s): Outputs include lab reports, manifests, and weight tickets for disposal of various media, - three Phase I and Phase II Reports, two Remedial Investigation Workplans, RI Reports, QAPPs
Task 4 – UST Closure and Removal
i. Project Implementation: A geophysical investigation will be conducted using approved funds obtained from HDSRF; data will be used during the cleanup phase of the project. Under the USEPA Brownfield Grant, USTs identified will be registered and closed per NJDEP requirements set forth in N.J.A.C. 14B (UST rules). The USTs will be opened, cleaned, rendered safe for removal, and excavated along with impacted soils.
ii. Anticipated Project Schedule: 2 nd Quarter 2023
iii. Task/Activity Lead(s): Robert Poppert, PP, AICP, Supervising Planner, Hamilton Township Environmental Consultant, Subcontractors
iv. Output(s): Outputs include an RAR which will document the volume of materials removed and document the confirmation of clean post-remedial sampling data. UST closure reports with documentation of number of USTs, contents, and disposal manifests.
Task 5 – Removal of Surface Impoundment and Soils
i. Project Implementation: The concrete surface impoundment, known to be contaminated with hazardous materials, will be characterized, demolished, and transported for offsite disposal upon authorization from a licensed facility. Contaminated soil surrounding and beneath the impoundment will be excavated, stockpiled, and transported offsite. The municipal sewer line will be capped to prevent further contaminant migration. Post remedial samples will be collected, laboratory analyzed, and evaluated for compliance with environmental standards.
iii. Task/Activity Lead(s): Robert Poppert, PP, AICP, Supervising Planner, Hamilton Township, Environmental Consultant, Subcontractors
iv. Output(s): Outputs include RAR which documents volume of materials removed and confirmation of clean post-remedial sampling data

c. Cost Estimates

The estimated project cost totals \$600,000 with \$500,000 to be provided by the USEPA Brownfield grant and \$100,000 via a combination of in-kind staffing support and CDBG funds from the Township. The scope of work and cost estimate were prepared by an experienced LSRP/EC with input from the Township, and includes environmental professional services, and subcontractor services.

Budget Categories		Task 1	Task 2	Task 3	Task 4	Task 5	Total Budget
Direct Costs	Personnel	62,500	16,000	29,875	18,600	16,100	143,075
	Fringe Benefits	0	0		0	0	0
	Travel	0	800		0	0	800
	Equipment	0	0		0	0	0
	Supplies	0	0		0	0	0
	Contractual	0	1,500	199,125	85,000	70,500	356,125
	Other (N/A)	0	0		0	0	0
Total Direct Costs		62,500	18,300	229,000	103,600	86,600	500,000
Indirect Costs		0	0		0	0	0
Total Fed. Funding		62,500	18,300	229,000	103,600	86,600	500,000
Cost Share (20%)		12,500	3,660	45,800	20,720	17,320	100,000
Total Budget		75,000	21,960	274,800	124,320	103,920	600,000

Task 1: Programmatic Management, Engineering Oversight, and Report Preparation: Grant Management Consultant \$15,000 (\$5,000/year for 3 years); Technical Professionals/LSRP \$30,000 (300 hours @ \$100/hour); Remedial Action Workplan \$6,500 lump sum; Quality Assurance Project Plan/Sampling, Analysis & Monitoring Plan \$5,500, lump sum; Bid/Request for Proposal \$5,500, lump sum; **Task 2: Community Engagement:** Outreach Plan/Strategy Document \$2,500 lump sum; Plan Implementation \$10,000 lump sum; Technical Professionals/LSRP \$3,500 (35 hours @ \$100/hour); \$800 for travel and parking; Contractual \$1,500 for signs and other printing; **Task 3: Disposal of Drums, ASTs, Waste Piles, and Solid Waste:** Technical Professionals/LSRP \$25,000 (250 hours @ \$100/hour); Administrative Management \$4,875 (75 hours @ \$65/hour); Contractual Waste Characterization and Analysis \$69,125 lump sum; Disposal of Drums, ASTs Waste Piles and Solid Waste \$130,000 lump sum; **Task 4: UST Closure and Removal:** Technical Professionals/LSRP \$16,000 (160 hours @ \$100/hour); Administrative Management \$4,875 (75 hours @ \$65/hour); Contractual \$85,000 and includes UST Closure Plan (\$10,000) and UST Removal (\$75,000); **Task 5: Removal of Surface Impoundment and Soils:** Technical Professionals/LSRP \$135,500 (135 hours @ \$100/hour); Administrative Management \$2,600 (40 hours @ \$65/hour); Contractual \$70,500 and includes labor and equipment for removal of surface impoundment (\$56,000) and Testing and Disposal (\$14,500)

d. Measuring Environmental Results

The LSRP/EC will evaluate data as collected to determine appropriate cleanup concentrations of identified contaminants and will coordinate and report on cleanup goals with the NJDEP, USEPA and local Health Department. The Township will monitor positive impact on the redevelopment of Bromley, evaluate the number of jobs created, the value of leveraged funding, the number of affordable housing units created, and the anticipated number of people impacted by the cleanup. The Township will work with its partners, including higher education and non-profit organizations, to measure and evaluate performance towards achieving desired outputs and outcomes. Data tracked will be used to complete reports as per the negotiated work plan with USEPA.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Structure

The Hamilton Township Department of Community & Economic Development (CED) and Finance Department will manage financial and operational aspects of project implementation. The Supervising Planner will serve as the project lead and will work directly with the selected consultants and Township staff to keep the project on time and within budget. The CED has a team of experienced engineers, planners, land use professionals and support staff that can be called upon to assist with this project.

To expand local capacity and to increase the number of brownfields being addressed at any given time, the Township has contracts with several environmental firms, including those with LSRPs that can provide program assistance, technical assistance and grant management on an as-needed basis. Cleanup activities will be conducted under the oversight of an LSRP. Through this approach, the Township has increased capacity for utilizing grant funds effectively, while ensuring that grant requirements are followed, sites are properly addressed, and the work is completed on schedule and within budget.

ii. Description of Key Staff

Fred Dumont, the Director of the Department of Community and Economic Development (CED) is the 2nd longest standing board member of the NJEDA and served as the Vice-President of the New Jersey State Building and Construction Trades Council, as well as other leadership positions with Mercer/Burlington and Monmouth/Ocean Trades Councils. Additionally, Dumont was a member of the Mercer County Workforce Investment Board. Mr. Dumont serves as the executive in charge of the project.

Robert Poppert, PP, AICP, Supervising Planner for the Township has experience with municipal project management, public interaction and managing consultants. Mr. Poppert has effectively managed NJ Department of Transportation (NJDOT) and US Department of Energy (DOE) grants ranging from \$300K to \$800K. Mr. Poppert will serve as the Municipal Manager for the project and provide project oversight including strategic planning and the day-to-day operations, and participation in public engagement activities.

iii. Acquiring Additional Resources

When the need for additional resources arises, the Township will prepare Requests for Proposal, Bid/Quotes for review and implementation by the Township. Documents will meet federal, state and local procurement requirements. Initial scopes of works will be drafted by the selected LSRP/EC with input from the Township, NJDEP and USEPA. Formal RFPs will be prepared and undergo a rigorous QA/QC process before being presented. The Township will be responsible for advertising the RFPs and the LSRP/EC and associated staff will assist with site walks, Q&A and selection of the winning contractor. Each procurement contract goes through the Township's authorization process and a professional services agreement is executed. Procurement will be conducted competitively per 2 CFR 200. 317 through 200. 326.

b. Past Performance and Accomplishments

i. Has Not Received a USEPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements: The Township has not received a USEPA brownfields grant but has successfully managed other grants and demonstrates past performance on the below listed grants.

NJDEP/NJEDA HDSRF Grants totaling \$250,000 for PA, SI/RI secured in 1997-2005 for evaluation and characterization of the Nearpara site. The initial PA, SI and RI were prepared and resulted in development of the cleanup plan for which this grant applies. All administrative requirements were met for this grant and all funding has been expended.

Safe Routes to School Grants in 2018 for \$342,000 for new sidewalks, ADA ramps, crosswalks, pedestrian crossing flashing signals, pedestrian warning signage. A 2012 grant was also awarded for \$322,500. The Township, as Responsible Charge (RC), was successful in administering the grant in all phases of development, construction, inspection and grant closeout. Outcomes included improved pedestrian accessibility to and from three Elementary Schools, added segments of sidewalk and safer road crossings.

ARRA Energy Efficiency and Conservation Block Grant in 2009 of \$835,300 from the DOE for projects including Municipal Building HVAC and electrical upgrades, windows and lighting upgrades and a rooftop solar PV system at the Department of Public Works (DPW). Investment Grade Energy and Water Assessments were completed for municipal owned buildings. The Township completed projects on time and within budget and filed closeout federal paperwork with the DOE.

**Narrative Attachment: Documentation indicating
Committed Leveraged Resources, if applicable.**

Narrative Attachment: Documentation indicating Committed Leveraged Resources, if applicable.

Hamilton Township is eligible to receive and intends to leverage the USEPA cleanup grant with in-house resources and funding from the NJDEP Hazardous Discharge Site Remediation Fund (HDSRF) and Community Development Block Grant (CDBG) funds.

A grant of \$246,001 was awarded in October 2021 to conduct a Site Investigation (SI) and Remedial Investigation (RI) at the site. Secured resources include Township staff to provide site clearing of vegetation (completed November 2021) project oversight and site security and CDBG funds representing \$100,000 as cost share and an additional \$150,000 to complete work not covered by USEPA and NJDEP grants. In addition, the Township, and the Township's Economic Development Advisory Commission (EDAC) will work in parallel with the cleanup process to find a developer for the site willing to provide funds and other resources toward site reuse.



State of New Jersey

PHILIP D. MURPHY
Governor

DEPARTMENT OF ENVIRONMENTAL PROTECTION
SITE REMEDIATION AND WASTE MANAGEMENT PROGRAM

SHAWN M. LATOURETTE
Commissioner

SHEILA Y. OLIVER
Lt. Governor

OFFICE OF BROWNFIELD REUSE
MAIL CODE 401-05K
P.O. Box 420
TRENTON, NEW JERSEY 08625-0420
[HTTP://WWW.STATE.NJ.US/DEP/SRP](http://www.state.nj.us/dep/srp)

October 6, 2021

Fred DuMont, Director
Township of Hamilton
2090 Greenwood Avenue
PO Box 001500
Hamilton, NJ 08650

Re: Hazardous Discharge Site Remediation Fund (HDSRF) Application
Applicant: Township of Hamilton
Site Name: Former Nearpara Rubber Factory
1849 East State Street
Hamilton, Mercer County
NJDEP PI ID G000001910

Dear Mr. DuMont:

The New Jersey Department of Environmental Protection (NJDEP) has completed a review of a funding request through the Hazardous Discharge Site Remediation Fund (HDSRF) for the completion of Preliminary Assessment (PA), Site Investigation (SI), and Remedial Investigation (RI) activities.

A grant request in the amount of \$246,001 has been submitted for review for consideration for an HDSRF grant. This amount includes \$4,500 for the PA, \$158,228 for the SI, and \$83,273 for the RI. The Department has found the proposal to be technically eligible for funding.

Therefore, the Department is recommending the New Jersey Economic Development Authority (NJEDA) obligate a grant in the amount of **\$246,001** for the proposed work at the site. Please note that the NJEDA is now requiring municipalities to submit a valid Tax Clearance certificate to file a Public Entity Grant Agreement. You will also be notified in the initial letter that is sent by NJEDA requesting the application fee and any additional documents. Following final approval of the grant by the NJEDA, the Department is recommending disbursement in the full amount of \$246,001 for the proposed work.

The Department's recommendation for the award of a grant from the HDSRF, and its determination that certain remediation costs are eligible for grant funding, is subject to the review

and approval of the NJEDA, which, if in agreement with the Department's recommendation, will forward the recommendation to its Board for consideration. Any award by the NJEDA's Board is subject to a ten-day gubernatorial veto period and the appropriation of money to the Fund in an amount adequate to pay the grant. Any grant awarded from the HDSRF is to cover remediation costs for the calendar year covered by the application. An applicant seeking a grant to cover remediation costs for subsequent calendar years must re-apply to the HDSRF. There is no guarantee of any funding in this year or future years.

If you have any questions regarding this letter, please feel free to contact Michael Deely at 609-633-1332.

Sincerely,

A handwritten signature in cursive script, appearing to read "William J. Lindner".

William J. Lindner, Manager
Office of Brownfields Reuse

Cc Marcia Blackwell, VHB
DEPFile



October 13, 2021

Marcia Blackwell
VHB
1805 Atlantic Avenue
Manasquan, NJ 08736

**RE: Hazardous Discharge Site Remediation Fund
("HDSRF") Municipal Grant Program
Former Nearpara Rubber Factory
Product 300363**

Dear Ms. Blackwell:

The New Jersey Department of Environmental Protection ("DEP") has reviewed the above referenced application and determined that the proposal to conduct Preliminary Assessment (PA), Site Investigation (SI) and Remedial Investigation (RI), are technically eligible for funding under HDSRF.

The DEP has approved costs from the **HDSRF in the amount of \$246,001**, which does not include the Authority application fee of \$500.00. Please forward your check made payable to the NJEDA in the amount of \$500 to: NJEDA, PO Box 990, Trenton, NJ 08625 Attn: HDSRF program. In addition, please submit a Resolution to submit application to HDSRF and a Tax Clearance certificate which is required. You can apply to the Division of Taxation on-line at: www.state.nj.us/treasury/taxation/busasst.shtml. The application fee is not required for a municipality certificate.

If you should have any questions, please do not hesitate to email me at: Kjunghans@njeda.com

Please submit the required fee by December 15, 2021 in order to keep your application active.

Sincerely,
Kathy Junghans
Finance Officer
Credit Underwriting

cc: Michael Deely, NJDEP
cc: Fred DuMont, Twp of Hamilton

**Narrative Attachment
Threshold Criteria Response**

**HAMILTON TOWNSHIP, NEW JERSEY
US ENVIRONMENTAL PROTECTION AGENCY
BROWNFIELDS CLEANUP GRANT PROPOSAL
THRESHOLD CRITERIA**

1. Applicant Eligibility: The grant applicant is Hamilton Township, New Jersey (The Township). The Township is an eligible grant applicant and is a general-purpose unit of a “Local Government as defined and stated under 2 CFR & 200.64

2. Previously Awarded Cleanup Grants: We affirm that the proposed Nearpara Rubber Factory site has not received funding from a previously awarded United States Environmental Protection Agency (USEPA) Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds: Not applicable, please see #2 above.

4. Site Ownership: Hamilton Township is the sole owner of the Nearpara Rubber Company property having acquired the property via tax lien foreclosure on December 3, 1996.

5. Basic Site Information:

Name of the site: Former Nearpara Rubber Factory Site

Site address: 1849 East State Street, Hamilton, NJ 08619

Current owner: Hamilton Township, which acquired the site via tax lien foreclosure on December 3, 1996

6. Status and History of Contamination at the Site

(a) Is this site is contaminated by hazardous substances or petroleum?

The site contains both petroleum and hazardous materials contamination with hazardous materials being the primary source of contamination. The primary site contaminants are attributable to the Aboveground Storage Tanks (ASTs), Underground Storage Tanks (USTs), transformers and the surface impoundment on the property. The ASTs on the property were historically used to store oils and solvents. The USTs were historically used to store gasoline. The discharge from the transformers onsite included polychlorinated biphenyls (PCBs). The surface impoundment was used to discharge wastewater from the former operations which included caustic material.

(b) Operational History/Current Use of the site

The site is a 2.99-acre property located in an industrial and residential area of the Township of Hamilton. The Nearpara Rubber Factory (Nearpara) was established in 1920 when Hyman Rosenthal purchased the farmland from Rudolph Kuser. Nearpara’s operation included reclaiming used rubber products such as tires and inner tubes and returning them to their raw state. The process included feeding the used rubber materials into a cracker mill which consisted of two (2) large steel rollers that reduced the rubber to 0.125-inch particles. The particles were then passed over magnets to remove metals and then cooked in a water and oil solvent for approximately five (5) hours. The cooked material was passed through two (2) steel rollers and flattened into sheets. The water and oil were separated with the oil being returned to the cooking process, and the water and dilute caustic pumped into a settling reservoir. The water was then diluted and discharged into the sanitary sewer. .

The former property owner, William Edward Wallace, declared bankruptcy in 1990. In 1992, the former owner turned in his keys to the US Trustee's office and disappeared. The site was liquidated in 1993 via Chapter 7 with \$225,000 owed to the New Jersey Department of Environmental Protection (NJDEP) in fines and violations. The USEPA conducted a \$935,000 emergency removal action in 1994-1995 to address environmental concerns left behind upon vacancy. The contaminants removed by the USEPA included solvents, solvent sludges, lead containing grease and sludges, waste oil, caustics, lab reagents and PCBs.

The property is currently vacant and non-operational since the bankruptcy and subsequent shut down in 1993. The three (3) structures, the plant building on the east side of the property, the office/lab space on the southwest side of the property, and the storage shed near the northern property boundary, are in various stages of disrepair. Several tons of solid waste remain including various forms of rubber that were staged for recycling. Several ASTs, USTs and drums are present.

(c) Environmental Areas of Concern (AOC)

AOC-1: FORMER ABOVEGROUND STORAGE TANKS (ASTs)

- Historically, up to nine (9) ASTs were associated with the site.
- The ASTs reportedly contained various liquids including air oil, solvent residue, water, 410 oil and 1102 oil.
- During Brinkerhoff's site visit, several ASTs were observed on the property, emptied, cleaned and cut in half to prevent re-use.
- 2005 PMK Group (PMK) remedial investigation (RI): arsenic, zinc and total petroleum hydrocarbon (TPH) were reported over the applicable NJDEP Direct Contact Soil Cleanup Criteria (SCC).
- Removal of ASTs and additional investigation is recommended.

AOC-2: FORMER UNDERGROUND STORAGE TANKS (USTs)

- According to the 1997 Preliminary Assessment (PA) from Remington and Vernick (R&V), five (5) USTs were noted for the site: Two (2) 20,000-gallon gasoline USTs are located beneath the tank farm area, one (1) 1,000-gallon gasoline UST is located near the entrance, one (1) UST of unknown size is also located in the tank farm area and one (1) 500-gallon gasoline UST is reported to be near the center of the property. None of the USTs are currently registered with the NJDEP.
- 2005 PMK RI: TPH, volatile organic compounds (VOC) and zinc were reported in the soil sample data.
- Removal of the USTs and additional investigation is recommended.

AOC-3: RAIL LINES, SPURS OR SIDINGS

- 2005 PMK RI: TPH and PCBs were reported above the soil cleanup criteria. Additional investigation is recommended.

AOC-4: ABOVE GROUND PUMP STATION

- 2004 PMK installed one (1) soil boring to 10 feet below grade at the location of the pump station and collected one (1) soil sample for PP+40 which was below SCC. Investigation is proposed to confirm the soil results at AOC-4 since remedial standards and analytical parameters have changed. Additional investigation is recommended.

AOC-5: SUMPS/PITS

- Several sumps/pits were historically noted onsite.
- 2004 PMK RI: TPH, metals, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, butyl benzo phthalate, indeno(1,2,3-cd) pyrene, and benzo(a)anthracene were reported above the NJDEP SCC for AOC-5.
- 2005 PMK RI: Zinc, antimony, lead, and arsenic were reported over SCC.
- Additional investigation is recommended.

AOC-6: LOADING/UNLOADING AREA

- Historically, two (2) loading/unloading areas were noted, one (1) for the plant and one (1) for the office/lab.
- 2005 PMK RI: Soil samples were reported below the applicable SCC for base neutral compounds and PCBs. The laboratory data package was not included in the NJDEP file for review.
- Additional investigation is recommended.

AOC-7: DRUM STORAGE AREAS

- Four (4) areas were noted for drum storage on the historic Sanborn maps.
- 2004 PMK RI: benzene, benzo(a)pyrene, benzo(b)fluoranthene, zinc, PCBs, antimony, and arsenic were at concentrations over the SCC.
- Additional investigation is recommended.

AOC-8: STORAGE AREA – COAL

- The Sanborn maps from 1955 through 1991 depict an 8-foot coal pile near the northern limit of the property.
- 2005 PMK RI: PCBs concentrations at AOC-8 were reported above the SCC.
- Additional investigation is recommended.

AOC-10: TRENCHES AND FLOOR DRAINS

- Not well investigated historically, SI/RI proposed.

AOC-11: ROOF LEADERS

- PMK 2004 RI: PCBs and zinc were reported at concentrations above the SCC.
- 2005 PMK RI: PCBs were reported at concentrations above the SCC.
- Additional investigation is recommended.
-

AOC-12: WASTE PILES

- 2005 PMK RI: PCBs were reported at concentrations over the SCC.
- Additional investigation is recommended.

AOC-13: TRANSFORMERS

- According to the USEPA memo dated April 19, 1994, 11 transformers were emptied and rinsed by the USEPA during their clean-up process; the transformers were left onsite. The site was vandalized, and the copper parts were removed from inside the transformers. During this process, remaining parts of the transformers were discarded onsite and led to the release of residual oils containing PCBs. PCB-contaminated soil was removed from the site by the USEPA in April 1995.
- 2004 PMK SI/RI: TPH and lead over the SCC.
- 2005 PMK SI/RI: PCBs above SCC in several of the soil samples.
- 2005 PMK SI/RI: PCBs above EPA limits with concentrations as high as 12.9 parts per billion (ppb)
- Additional investigation is recommended.

AOC-14: UNDERGROUND PIPING

- Underground piping was used for sanitary sewage and for process water.
- PMK 2005 RI/SI: Arsenic and TPH were reported at concentrations above the SCC.
- Additional investigation is recommended.

AOC-15: SURFACE IMPOUNDMENT

- Formerly used to process water waste streams
- PMK 2004 SI/RI: Zinc, antimony, TPH, benzo(a)pyrene, benzo(b)fluoranthene, indeno (1,2,3-dc) pyrene, benzo(a)anthracene, benzo(k)fluoroanthene, chrysene, dibenzo(a,h)anthracene, VO tentatively identified compounds (TICs), and xylenes were reported in excess of the SCC.
- 2006 PMK SI/RI: Benzo(a)pyrene, benzo(b)fluoranthene, zinc, antimony, and lead were reported above the SCC.
- Additional investigation is recommended.

AOC-16: PRODUCTION WELLS

- Two (2) production wells are located near the southern property boundary. NJDEP records indicate one (1) well was installed in 1952 to 46 feet below grade. The second well was installed in 1958 to 35 feet below grade.
- Historic NJDEP files indicate the production wells were sampled in January of 1985 and trichloroethylene was detected at 10 parts per million (ppm) in one (1) well; however, it is unclear which well reported the trichloroethylene concentration.
- 2006 PMK inspected the pit adjacent to the process building and surrounding area for the production wells. A concrete pad (24 inches by 24 inches) was identified; inside the pit, the disassembled pumping equipment was left on the floor, indicative of the wells being abandoned. Subsequently, PMK requested abandonment reports for the two (2) production wells. Documentation of the well closure was not provided. Inspection of the wells by a licensed well driller followed by sampling and sealing of the wells, if they remain open, is recommended.

AOC-17: BOILER ROOM

- The 1997 R&V PA noted the boiler room as an AOC due to extensive staining.
- Additional investigation is recommended.

AOC-18: AIR VENTS AND DUCTS

- Several ducts and vents are present throughout the plant building including one (1) permitted stack.
- Several violations were issued by the NJDEP with regard to the air permit for the facility.
- 2005 PMK SI/RI: Zinc, PCBs, TPH, ethylbenzene and xylenes were reported over the SCC.
- Additional investigation is recommended.

AOC-19: HAZARDOUS DUST

- R&V cited hazardous dust as an AOC in their 1997 PA due to the volume of the dust inside the plant building.

AOC-20: SITEWIDE DRUMS, BUCKETS, PAINT CANS, RUBBER & SOLID WASTE

- Brinkerhoff observed several 55-gallon drums on the property containing varying amounts of unknown liquid, several 5-gallon buckets containing roofing tar, paint cans, piles of rubber debris and various solid waste during the site inspection. Waste characterization, removal of material and confirmatory sampling is proposed.

AOC-21: GROUNDWATER

- Nine (9) monitoring wells onsite, one (1) located during PA site walk
- Groundwater historically reported 8-9' below grade
- Most recent groundwater data, January 2006, reported VO TICs, benzene, xylenes, BN TICs, antimony, lead, and zinc above the NJDEP Class IIA Ground Water Quality Standards (GWQS)
- Additional investigation is recommended.

AOC-22: BUILDING CONDITIONS

- Three (3) onsite structures were confirmed to contain asbestos, lead, hazardous dust and staining. The structural integrity of the buildings requires evaluation prior to further work therein and to determine demolition parameters. Additional sampling and analysis will be required after the structural/geotechnical evaluation is complete.

(d) How the site became contaminated including the nature/extent of contamination

The site became contaminated from former site operations which included the recycling of rubber. The solvents and oil used for the rubber recycling process were stored in ASTs which were reported to be in poor conditions with evidence of discharge. The USTs used primarily for petroleum storage may have discharged to the environment based on the evidence of corrosion. Transformers were left onsite which discharged to the surface soils when they were vandalized for copper salvage. The surface impoundment was historically used to discharge wastewater from the rubber recycling process. Discharges from the surface impoundment were noted historically due to leaks in the system.

7. Brownfields Site Definition:

- (a) The site is not currently, nor has it ever been, listed or proposed for listing on the National Priorities List

- (b) The site is not subject to unilateral administrative orders, court orders, administrative orders on consent,
- (c) The site is not subject to judicial consent decrees issued to or entered into by parties under CERCLA; or subject to the jurisdiction, custody or control of the United States government.
- (d) The Nearpara site meets the definition of a Brownfield Site.

8. Environmental Assessment Required for Cleanup Grant Applications

The historic Preliminary Assessment (PA), Site Investigation (SI) and Remedial Investigation (RI) reports available for the property include the following:

- The Whitman Companies, Inc. (Whitman) Revised Sampling Plan, dated December 4, 1985: This report identified six (6) AOCs: 1) leaking gasoline tank; 2) transformer discharge; 3) railroad siding loading dock; 4) tank farm with 7 tanks; 5) discharge of blade grinder; 6) discharge from decommissioned settling reservoir and outlined the revised soil and groundwater sampling planned for the property. The routes for exposure, site characteristics, and geology were discussed, and sampling locations were developed based on the above-noted characteristics and historic documents reviewed for the property.
- Scott Environmental Inc. (Scott) report dated ~1985 (no date is identified on the report, publication is estimated). The report indicated there were seven (7) ASTs located in the tank farm area for the storage of processing oils, and one (1) AST containing diesel near the front gate. Four (4) USTs were noted: one (1) containing #6 fuel oil, one (1) UST not in use, one (1) UST containing gasoline that was located near the front gate and one (1) UST containing caustic material located under the cook house. The Scott report indicated there were eight (8) air permits with the NJDEP for the property, a New Jersey Pollution Discharge Elimination System (NJPDES) discharge to groundwater permit and a Township of Hamilton sanitary sewer permit. Violations to the air permits and sanitary sewer permit were reported. The Scott report also referenced six (6) AOCs:
 1. Leaking gasoline UST;
 2. Transformer leakage at the front right corner of the property;
 3. Railroad siding loading dock was noted in the center of the property near the storage building;
 4. Tank Farm including multiple AST and USTs;
 5. Discharge from the blade grinder located near the Cook house door;
 6. Discharge from the decommissioned settling reservoir in the north corner of the property; and,
 7. Groundwater: Two (2) production wells are present and when sampled in January 1985 reported trichloroethylene. Four (4) monitoring wells were installed as part of the NJPDES permit for the surface impoundment. VOCs and base neutral compounds were reported in the groundwater.
- Remington and Vernick Engineers (R&V) PA report dated January 15, 1997. The PA identifies the ownership history for the property back to 1894, a history of operations which includes Nearpara from 1927 to 1993, a hazardous waste inventory associated with former operations, and discharge permits associated with former operations. The following 23 AOCs were identified for the site:

1. ASTs
2. USTs
3. Rail spurs,
4. Pump stations,
5. Sumps
6. Pits
7. Loading/unloading areas
8. Storage pads
9. Surface lagoons/impoundments
10. Chemical storage cabinets
11. Floor drains or trenches
12. Roof leaders when process operations vent to roof
13. Septic system, leachfield or seepage pit
14. Waste piles
15. Electrical transformers
16. Underground piping
17. Non-contact cooling water discharges
18. Production wells
19. Boiler rooms
20. Air ducts and vents
21. Asbestos
22. Lead based paint and
23. Hazardous dust

The tanks were reported to contain oils, solvents and other liquids. Tanks were reportedly emptied and cleaned by the USEPA. R&V recommended sampling at each AOC to assess current conditions.

- R&V Site Investigation Report, October 19, 2000. The SIR identifies Nearpara operation dates from 1927 to 1993. According to the SIR, the site was abandoned in 1993 as a result of bankruptcy and the USEPA removed materials including several drums, PCB-contaminated transformers and unknown chemicals. The USEPA also decommissioned (i.e., emptied) several ASTs but did not remove them. According to the SI, 22 AOCs were investigated:
 1. ASTs and piping
 2. USTs and piping
 3. Railroad spur
 4. Pump stations
 5. Sumps
 6. Pits
 7. Loading/unloading areas
 8. Storage areas – drums
 9. Storage areas – coal
 10. Surface impoundments/lagoons
 11. Chemical storage cabinets
 12. Floor drains and trenches

13. Roof leader
14. Waste piles
15. Electrical transformers
16. Underground piping
17. Industrial production wells
18. Boiler room
19. Air ducts and vents
20. Asbestos materials
21. Lead based paints
22. Hazardous dust

The SIR confirmed soil and groundwater impacts at several AOCs and recommended remedial investigation to delineate the impacts observed. The SIR also recommended removal of raw materials and wastes from the site and the removal of free product from MW-2. Removal of USTs, asbestos materials and contaminated soil were also identified as important steps in the remediation of the property.

- PMK Group (PMK) Supplemental Site Investigation Workplan (SIW) dated February 3, 2004. The SIW discussed the site history and identifies 13 AOCs remaining to be addressed including: two (2) #6 fuel oil 20,000-gallon USTs, pump station near front gate, sumps and pits (located in the tank farm area), drum storage areas, chemical storage cabinets, trench and piping, roof leaders, waste piles, electrical transformer areas, underground piping including process sewers, surface impoundments, production wells, and air vents and ducts. PMK is proposing a supplemental site investigation to determine impacts to soil and groundwater and address the NJDEP letter from Linda Range, case manager, dated October 30, 2001. PMK anticipated installing 75-80 soil borings and 11 additional monitoring wells. The proposed sampling plan included the newly installed monitoring wells and additional soil sampling at each remaining AOC.
- PMK Supplemental SIW dated January 26, 2005. This report identified 22 AOCs including:
 1. ASTs
 2. USTs
 3. Rail spur
 4. Aboveground pump station
 5. Sumps
 6. Loading/unloading areas
 7. Storage area – drums
 8. Storage area – coal
 9. Chemical storage cabinets
 10. Floor drains and trenches
 11. Roof leaders
 12. Waste piles
 13. Electrical transformers
 14. Underground piping
 15. Pits
 16. Surface impoundments

17. Industrial production wells
18. Boiler room
19. Air vents
20. Hazardous dust
21. Asbestos-containing material and
22. Lead-based paint

PMK summarized the previous investigation completed by R&V. The SOW was amended based on a meeting with NJDEP case manager, Linda Range. The proposed sampling plan or preliminary results for each AOC were summarized. Site figures with sample locations and laboratory data packages were provided with the SIR. The PMK SIW did not address the septic system or non-contact cooling water as an AOC.

- PMK Remedial Investigation Workplan (RIW) dated April 20, 2005. Historic site operations and a brief overview of the previous investigations were included. The proposed remedial investigation includes an additional 48 soil borings and an estimated 91 soil samples plus three (3) additional monitoring wells to investigate the previously identified AOCs on the site.
- PMK Remedial Investigation Report (RIR) dated June 8, 2006. The RIR summarized the completed site investigation work completed on the property and detailed the additional remedial investigation completed December 21 through December 27, 2005. Additional sampling was completed at most of the AOCs on the property. Monitoring wells MW-1 through MW-6 and newly installed wells MW-7 through MW-9 were also sampled. Free product was noted in MW-2. Based on the RIR, PMK made the following recommendations:
 1. A deed notice and cap to address remaining impacted soil containing zinc, lead, arsenic, and PAHs;
 2. A Remedial Action Workplan (RAW) to outline the institutional and engineering controls recommended for the site;
 3. Closure/removal of the ASTs and USTs;
 4. Two (2) additional monitoring wells to delineate impacted groundwater;
 5. A baseline ecological evaluation;
 6. A rising slug test to estimate the hydraulic conductivity;
 7. Fingerprint analysis of the free product observed in MW-2;
 8. Groundwater sampling program for a minimum of one (1) year on a quarterly basis followed by a Classification Exception Area (CEA);
 9. Completion of a Remedial Action Selection Report/RAW for the impacts to groundwater. {Volume 4-7 not provided}

9. Enforcement or Other Actions

No ongoing or anticipated enforcement actions.

10. Sites Requiring a Property-Specific Determination

A property-specific determination is not required for this site.

11. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility - Hazardous Substance Sites

i. Exemptions to CERCLA Liability

- (1) Indian Tribes; Does not apply.
- (2) Alaska Native Village Corporations and Alaska Native Regional Corporations; Does not apply.
- (3) Property Acquired Under Certain Circumstances by Units of State and Local Government
 - The Nearpara property was acquired by Hamilton Township via tax lien foreclosure.
 - The property was acquired on December 3, 1996.
 - The disposal of hazardous substances at the site occurred before the Township acquired the property.
 - The Township has not caused or contributed to any release of hazardous substances at the site.
 - The Township has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

ii. Exceptions to Meeting the Requirement for Asserting an Affirmative Defense to CERCLA Liability

Hamilton Township is a public entity/municipality and acquired the Nearpara site prior to January 11, 2002 and is eligible for a Brownfields Grant and may use grant funds to address contamination at the property, even if the Township does not qualify as a bona fide prospective purchaser. The Township did not cause or contribute to the release or threatened release of a hazardous substance at the property.

Provide the following information to demonstrate that the applicant qualifies for the exception at CERCLA § 104(k)(3)(E):

- (a) The former Nearpara Rubber Factory property was acquired by Hamilton Township via tax lien foreclosure.
- (b) The property was acquired on December 3, 1996.
- (c) The disposal of hazardous substances at the site occurred before the Township acquired the property.
- (d) The Township has not caused or contributed to any release of hazardous substances at the site.
- (e) The Township has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

iii. Landowner Protections from CERCLA Liability

(1) Bona Fide Prospective Purchaser Liability Protection

Does not apply.

a. Property Ownership Eligibility – Petroleum Sites

Does not apply.

12. Cleanup Authority and Oversight Structure

- a. The Township's Supervising Planner will serve as the Municipal Project Manager. The Municipal Project Manager will also coordinate the review and approval process for the remedial action with the Township's Health Department. Cleanup activities will be conducted under the oversight of a Licensed Site Remediation Professional (LSRP) that is contracted with the Township. LRSPs are licensed by the NJDEP and have the necessary technical expertise to conduct, manage, and oversee the cleanup of the Nearpara site and ensure the cleanup is protective of human health and the environment. The Township contracts with experienced environmental engineering firms to conduct cleanup activities. Procurement will be conducted competitively per 2 CFR 200.317 through 200.326. The selected firms and agreement amount will be subject to City Council authorization.
- b. Environmental investigations conducted to date do not confirm offsite contamination impact on adjacent properties. However, in the event that off-site access is required, the Township will negotiate such access with surrounding property owners.

13. Community Notification

a. Draft Analysis of Brownfield Cleanup Alternatives:

A draft Analysis of Brownfield Cleanup Alternatives (ABCA) was prepared for the site. A public notice was published in the Trentonian on October 14, 2021 and the Trenton Times on October 19, 2021.

b. Community Notification Ad

A paragraph describing the application and inviting public comment was run in the Trentonian on October 14, 2021 and the Trenton Times on October 19, 2021. The Public Meeting was also advertised via email and flyers posted in the community.

c. Public Meeting

Platforms for public comment were provided at an open public forum, held on October 25, 2021, whose sole purpose was to present and discuss the Township's USEPA grant application.

d. Submission of Public Notification Documents

Please see Attachment 6 for Community Notification documentation, which include:

- Draft ABCA;
- Public notification advertisement posted in the Trentonian and Trenton Times newspaper;
- Public meeting flyer
- Public meeting notes Q&A; and
- Public meeting sign-in sheet

14. Statutory Cost Share

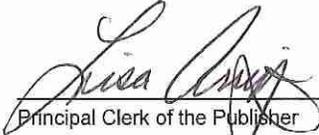
An estimate for the remediation at the Nearpara site indicates that remediation is anticipated to cost approximately \$500,000. The required match of \$100,000 will come from the Township's CDBG Funds. Hamilton Township has committed to providing the match via CDBG funds earmarked for the site. The Township is not requesting a hardship waiver.



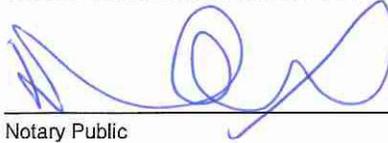
State of New Jersey,) ss
County of Middlesex)

Lisa Arrington being duly sworn, deposes that he/she is principal clerk of NJ Advance Media; that Times of Trenton is a public newspaper, with general circulation in Burlington, Hunterdon, Mercer, Middlesex, Monmouth, Ocean, and Somerset Counties, and this notice is an accurate and true copy of this notice as printed in said newspaper, was printed and published in the regular edition and issue of said newspaper on the following date(s):

Times of Trenton 10/19/2021


Principal Clerk of the Publisher

Sworn to and subscribed before me this 20th day of October 2021


Notary Public

Darian N Alexander
Notary Public
New Jersey
My Commission Expires November 13, 2022
No. 50071877

PLEASE TAKE NOTICE that on the 25th of October 2021 at 6pm Hamilton Township will hold a hearing on the USEPA Cleanup Grant Application that the undersigned is preparing at which time and place all interested persons will be given an opportunity to be heard. The hearing will be held at the Hamilton Township Senior Center 409 Cypress Lane, Hamilton, NJ. Social distancing will be observed, and masks are required. Members of the public are invited to attend and participate.

The location of the premises/property in question is the former Nearpara Rubber Site located in the Industrial Zoning District, Tax Map 59, Block 1636 Lot 4 more commonly known as 1849 East State Street, Hamilton Township, NJ. The application is to request funds from the USEPA to remediate the site.

The draft grant application and draft Analysis of Brownfield Cleanup Alternatives (ABCA) documents will be relied upon at the hearing. The documents are available for inspection and can be viewed online prior to the meeting by contacting the Hamilton Township Planning Office at (609) 890-3674. You may also contact the Planning Office with questions related to participation. Other questions may be directed to Marcia Blackwell, Grant Administrator at VHB, who may be contacted at mblackwell@vhb.com or (732) 223-2225.

At the time of the hearing, members of the public may ask questions and present comments in support of or in opposition to the application.

Vanasse Hangen Brustlin, Inc. (VHB)
By: Marcia Blackwell, Grants Administrator
10/19/21 THE TIMES \$21.46



PHILADELPHIA GROUP

AFFIDAVIT OF PUBLICATION
307 Derstine Avenue • Lansdale, PA 19446



VHB
1805 ATLANTIC AVE
MANASQUAN, NJ 08736
Attention:

STATE OF PENNSYLVANIA,
COUNTY OF MONTGOMERY

The undersigned Sharon Dietz, being duly sworn the he/she is the principal clerk of The Trentonian, published in the English language for the dissemination of local or transmitted news and intelligence of a general character, which are duly qualified newspapers, and the annexed hereto is a copy of certain order, notice, publication or advertisement of:

VHB

Published in the following edition(s):

The Trentonian 10/14/21

Commonwealth of Pennsylvania - Notary Seal
MAUREEN SCHMID, Notary Public
Montgomery County
My Commission Expires March 31, 2025
Commission Number 1248132

Sworn to the subscribed before me this 10/14/21.

Maureen Schmid
Notary Public, State of Pennsylvania
Acting in County of Montgomery

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At the time of the hearing, members of the public may ask questions and present comments in support of or in opposition to the application. Vanasse Hangen Brustlin, Inc. (VHB)
By: Marcia Blackwell, Grants Administrator
Prt fee:\$25.90
Oct 14-1a

Advertisement Information

Client Id: 1402468 **Ad Id:** 2237519 **PO:** **Sales Person:** 093301

Public Meeting

Monday, October 25, 6pm

DISCUSSION ON

Environmental Cleanup Former Nearpara Rubber Site

Site location: Block 1636, Lot 4

MEETING LOCATION

Hamilton Township Senior Center
409 Cypress Lane
Hamilton Township, NJ

PURPOSE

Presentation and discussion on the proposed remediation and future plans for redevelopment, including opportunities for public funding. Township Staff and their Environmental Consultant will be in attendance to answer questions.

Social distancing will be observed, and masks are required.

**For more information please contact the Hamilton Township
Department of Planning, 609-890-3674**



AGENDA

**FORMER NEARPARA RUBBER FACTORY
1849 EAST STATE STREET
BLOCK 1636, LOT 4
HAMILTON TOWNSHIP, MERCER COUNTY
NEW JERSEY**

October 25, 2021

I. Introductions

Hamilton Township

Fred Dumont, Department Community & Economic Development
Robert C. Poppert, PP, AICP, Supervising Planner, Division of Planning

VHB

Laura Brinkerhoff, LSRP, Principal
Paul Drucker, LSRP, Senior Project Manager
Marcia Blackwell, Grants Administrator

II. Site Description and Location

Bromley Neighborhood
Environmental Justice Designation
Arts and Culture Overlay

III. Purpose

USEPA Cleanup Grant Application \$500,000 request
Due December 1, 2021

IV. Project and Site History

V. Technical Discussion

Environmental Process Overview

VI. Analysis of Brownfield Cleanup Alternatives (ABCA)

Options for Cleanup and Selected Alternative

VII. Discussion and Public Comment

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Meeting Notes

**FORMER NEARPARA RUBBER FACTORY
1849 EAST STATE STREET
BLOCK 1636, LOT 4
HAMILTON TOWNSHIP, MERCER COUNTY
NEW JERSEY**

October 25, 2021

I. Introductions

Hamilton Township

Fred Dumont, Department Community & Economic Development

VHB

Laura Brinkerhoff, LSRP, Principal

Paul Drucker, LSRP, Senior Project Manager

Marcia Blackwell, Grants Administrator

II. Site Description and Location

Ms. Brinkerhoff gave an overview of the Bromley Neighborhood and reviewed the maps presented including the Environmental Justice Designation and known contaminated sites in the area.

III. Purpose

Ms. Blackwell gave an overview of the USEPA Cleanup Grant Application \$500,000 request, timeline and the grant process.

IV. Project and Site History

Mr. Drucker lead the technical discussion. He gave an overview of the site history and the project.

V. Technical Discussion

A discussion on the Environmental Process was led by Mr. Drucker

VI. Analysis of Brownfield Cleanup Alternatives (ABCA)

Options for Cleanup and the selected alternative was presented by Mr. Drucker

VII. Discussion and Public Comment

Ms. Blackwell lead the Q&A discussion with responses provided by Ms. Brinkerhoff and Mr. Drucker. See separate Q&A doc.

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**Former Nearpara Rubber Factory
1849 East State Street
Block 1636, Lot 4
Hamilton Township, Mercer County
New Jersey**

**Questions and Answers from
Public Meeting
October 25, 2021**

1. How will the Cleanup of the site be paid for?

- The United State Environmental Protection Agency (USEPA) grant if awarded will contribute \$500,000 toward the Remedial Action.
- The Hazardous Discharge Site Remediation Fund (HDSRF) Grant Approved for \$246,001 will contribute towards the site investigation and remedial Investigation. Additional funding, if needed, may be requested.
- Hamilton Township (The Township) will contribute a minimum of \$100,000 toward the cleanup of the site.

2. What is the cleanup standard for the site? Residential, Commercial, Industrial?

Soil and groundwater at the site will be remediated to the New Jersey Department of Environmental Protection (NJDEP) Remediation Standards. Soil will be remediated to as close to residential standards as possible. Capping is not desirable but may be an option to preclude human exposure to contaminants.

3. Will the USEPA Grant cover 100% of the cleanup?

No, the NJDEP and the Township will also be contributing financially toward the cleanup costs.

4. How far does the groundwater contamination extend on the site? Does it extend offsite?

The groundwater contamination has not been completed. Investigations conducted to date do not indicate groundwater contamination extends off site. Groundwater contamination will be delineated by VHB at a future date.

5. Can anyone on the NJ state level influence the approval of the USEPA application?

No, the USEPA does not accept recommendations for approval from individuals or entities in association with a particular grant. However, the USEPA does require that the NJDEP know about USEPA grant applications for particular sites and requires a letter from NJDEP acknowledging the grant application.

6. Is Hamilton Township committed to remediating the site?

Yes, Hamilton Township is very committed to remediating the site. They are working in hand in hand with the environmental consultant. The Township is currently clearing the site of vegetation and solid waste (non-hazardous) which needs to be

done to facilitate the investigation process. They are also contributing financially to the investigation and remediation.

7. Where will the contaminated material go?

Contaminated material will be tested and sent offsite to a licensed facility.

Noncontaminated material that can be recycled will go to the appropriate recyclers.

8. What will be the final use for the site? The residents are interested in a park.

Currently, the site is zoned commercial/industrial with an arts and culture overlay. As we move further along with the investigation and remediation, we will hold a second public meeting to solicit public comment on use of the site.

Analyses of Brownfield Cleanup Alternatives

ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES (ABCA)

**Former Nearpara Rubber Factory
1849 East State Street
Block 1636, Lot 4
Hamilton Township, Mercer County
New Jersey**

DRAFT

Prepared for: United States Environmental
Protection Agency
Region 2 Office
290 Broadway
New York, NY 10007-1866

On behalf of: Hamilton Township
2090 Greenwood Avenue
PO Box 00150
Hamilton, NJ 08650

Prepared by: Vanasse Hangen Brustlin, Inc.
1805 Atlantic Avenue
Manasquan, NJ 08736

Date: October 25, 2021

www.vhb.com

ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES (ABCA)

**Former Nearpara Rubber Factory
1849 East State Street
Block 1636, Lot 4
Hamilton Township, Mercer County
New Jersey**

DRAFT

October 25, 2021

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FIGURES

Figure 1 – Site Location Map

Figure 2 – Parcel Map

Figure 3 – Site Features Map

Figure 4 – AOC Map

ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES (ABCA)

**Former Nearpara Rubber Factory
1849 East State Street
Block 1636, Lot 4
Hamilton Township, Mercer County
New Jersey**

October 25, 2021

DRAFT

1.0 INTRODUCTION

The Township of Hamilton (The Township) is committed to the environmental cleanup of a Township-owned property known as the former Nearpara Rubber Factory (Nearpara) located at 1849 East State Street (referred to herein as “the site.”). the cleanup will involve the removal of leaking drums, storage tanks, waste piles, and contaminated stockpiles of soil located throughout the property. The purpose of the environmental cleanup is to prepare the property for future redevelopment. The Township is applying to the United States Environmental Protection Agency (USEPA) for a Brownfield Cleanup Grant in the amount of \$500,000 for the removal of hazardous waste and the environmental remediation of the site. If successful in this application, the Township will enter into a cooperative agreement with the USEPA, which will enumerate the terms and conditions for the Township’s use of Brownfields Cleanup Grant Funds, including a commitment by Hamilton Township to involve the community in the process.

The Township has contracted Vanasse Hangen Brustlin, Inc. (VHB) to prepare this Analysis of Brownfields Cleanup Alternatives (ABCA). The purpose of this ABCA is to present to the community the following:

Description of the environmental conditions at the site, based on the findings of the environmental assessment activities performed to date;

Selection of remediation alternatives to be considered for addressing the contamination identified;

Analysis of the various factors influencing the selection of a preferred remediation method, including site and contamination characteristics (i.e., exposure pathways, identification of contaminant sources, etc.), cleanup standards, potential future uses; cleanup goals; and,

Preferred remedial method selected, based on the analysis performed, including an evaluation of its effectiveness, ability to be implemented, and costs.

These items are discussed in the following sections of the ABCA.

1.1 Community Involvement Measures

The Township will facilitate community involvement in the project with the activities itemized below:

Discuss the availability of this ABCA, in its draft format, in a legal advertisement in the Trenton Times newspaper and during the brownfield stakeholder meeting.

Provide an opportunity for members of the community and targeted groups to provide written comments to the draft ABCA.

Provide an opportunity for members of the public to provide oral comments regarding the draft ABCA during a brownfield's stakeholder meeting.

Prepare written responses to the comments received and document changes made to the cleanup plans and to the draft ABCA resulting from the comments.

Establish a publicly accessible administrative record repository for the project, located in City Hall.

2.0 SITE BACKGROUND

2.1 Site Location and Description

The Former Nearpara Rubber Factory is a 2.99-acre property located in an industrial and commercial area of Hamilton Township with a residential area nearby. The site is identified as Block 1636 Lot 4 on the Hamilton Township tax map. (See Figure 1 – Site Location Map and Figure 2 – Parcel Map.) Hamilton Township owns the property and acquired it by a Certificate of Sale for Unpaid Municipal Liens dated December 5, 1996.

2.2 Site History

Nearpara was established at the site in 1920 when Hyman Rosenthal purchased farmland from Rudolph Kuser. Nearpara reclaimed used rubber products such as tires and inner tubes, and recycled them into raw rubber. The process included feeding the rubber products into the cracker mill which consisted of two large steel rollers that reduced the rubber to 0.125-inch particles. The particles were then passed over magnets to remove metals, and then cooked with water and oil for approximately five hours. After the material was cooked, the rubber was passed through two steel rollers and made into sheets. The water and oil were separated, and the oil was fed back into the cooking process. The water and dilute caustic were pumped into a settling reservoir where the water was diluted and discharged into the sanitary sewer.

The former property owner, William Edward Wallace, declared bankruptcy in 1990. In 1992, the former owner turned in his keys to the US Trustee's office and disappeared. The site was liquidated in 1993 via Chapter 7 with \$225,000 owed to the New Jersey Department of Environmental Protection (NJDEP) in fines and violations. The USEPA conducted a \$935,000 emergency removal action in 1994-1995 to address environmental concerns left behind during vacancy. The

contaminants removed by the USEPA included solvents, solvent sludges, lead-containing grease and sludges, waste oil, caustics, lab reagents, and polychlorinated biphenyls (PCBs).

The Township of Hamilton continued the environmental work on the property from approximately 1997 through 2006. A series of site investigation and remedial investigations were completed to identify the contaminants present onsite and delineate the limits of the contaminated media. The Township of Hamilton continued the environmental work on the property from approximately 1997 through 2006. A series of site investigation and remedial investigations were completed to identify the contaminants present onsite and delineate the limits of the contaminated media.

2.3 Surrounding Land Use

The site is immediately surrounded by commercial and industrial properties along East State Street. Woodland Manufacturing Company is located on the northeasterly adjoining property; Whitehead Road and rail lines are located northwest of the site; East State Street and the Congoleum property are located east of the site; East State Street and Dave's Automotive are south of the site; and Body by Apai, an automotive body shop, is the west adjoining property.

2.4 Project Goals/Property Reuse Plan

The Township will engage the community involvement to determine the ultimate reuse plan for the site. Options may include use as part of an Arts District, industrial/commercial development, and/or recreational/open space.

The objectives of this cleanup project are to complete the selected remedial action(s) in accordance with applicable NJDEP site cleanup requirements (as described in Section 3), which will provide regulatory oversight of the project, and will be conducted in accordance with the applicable USEPA requirements, and the terms and conditions of the Township's cooperative agreement with USEPA.

The ultimate outcome of the project will be a Response Action Outcome (RAO) letter from the Licensed Site Remediation Professional (LSRP) overseeing the remediation of the site.

2.5 Results of the Environmental Assessment

A Preliminary Assessment (PA) was completed in 2019 to identify potential Areas of Concern (AOCs) and evaluate the historic site investigation and remedial investigation activities completed. (See Figure 3- Site Features Map and Figure 4 – AOC Map.) The AOCs and site conditions were documented in the May 2019 PA Report. The historic PA, site investigations, and remedial investigations conducted by former consultants were reviewed and evaluated to determine which AOCs required additional investigation or remediation.

2.5.1 Identification of Contaminants of Concern

The 2019 PA identified 22 AOCs. Further investigation or remediation was recommended for 21 AOCs. The identified AOCs are as follows:

- 1) Former Aboveground Storage Tanks (ASTs)
- 2) Former Underground Storage Tanks (USTs)
- 3) Rail lines, spurs or sidings
- 4) Above ground pump station
- 5) Sump/pits
- 6) Loading/unloading areas
- 7) Drum storage areas
- 8) Storage area – coal
- 9) Chemical storage cabinets
- 10) Trenches and floor drains
- 11) Roof leaders
- 12) Waste piles
- 13) Transformers
- 14) Underground piping
- 15) Surface impoundment
- 16) Production wells
- 17) Boiler room
- 18) Air vents and ducts
- 19) Hazardous dust
- 20) Sitewide drums, buckets, paint cans, rubber and solid water
- 21) Groundwater
- 22) Building conditions

All AOCs with the exception of AOC-9 will require further investigation or remediation.

2.5.2 Exposure Pathways

In order for contaminants from a site to pose a human health or environmental risk, one or more completed exposure pathways must link the contaminant to a receptor (human or ecological). A completed exposure pathway consists of four (4) elements:

- Source and mechanism of substance release;
- Transport medium;
- Point of potential human or ecological contact with the substance (“exposure point”); and,
- “Exposure route,” such as, dermal contact, ingestion, etc.

Preliminary pathway evaluation indicates several potentially completed exposure pathways related to the site:

- Direct contact with the soil – Soil might be handled by a future site occupant.
- Soil to groundwater – Contaminants may leach from the unsaturated zone to groundwater and, in turn, be transported to downstream groundwater receptors.

These exposure pathways will be mitigated by implementation of the proposed cleanup activities, which include the removal of the solid and hazardous waste from the property, removal of the ASTs and USTs, and removal of the surface impoundment which was associated with a hazardous discharge to the sanitary sewer system. Future site work may include the testing and removal of contaminated soil and/or engineering or institutional controls may be used to prevent exposure pathways.

3.0 APPLICABLE LAWS AND CLEANUP STANDARDS

Environmental remediation will be performed in accordance with the applicable statutes of the State of New Jersey and the regulations and guidance from the NJDEP. These include:

- The NJDEP *Administrative Requirements for the Remediation of Contaminated Sites*, N.J.A.C. 7:26C;
- The NJDEP *Site Remediation Reform Act* (SRRA), New Jersey Statutes Annotated (N.J.S.A.) 58:10C-1 et seq.;
- The Brownfield and Contaminated Site Remediation Act, N.J.S.A 58:10B-12; and
- The NJDEP *Technical Requirements for Site Remediation*, New Jersey Administrative Code (N.J.A.C.) 7:26E.

Field activities will be performed in accordance with the NJDEP Field Sampling Procedures Manual (last updated August 2005). A USEPA approved Quality Assurance Project Plan (QAPP) will also be prepared prior to commencement of field work.

The site will ultimately be remediated to the NJDEP Remediation Standards, N.J.A.C. 7:26D, last amended May 17, 2021, which include the following:

- Soil remediation standards (SRS) for the ingestion-dermal pathway, the inhalation exposure pathway, and soil and soil leachate remediation standards for the migration to groundwater exposure pathway. Numeric values for Residential and Non-Residential Soil Remediation Standards (RSRS and NRSRS) have been established for each pathway
- The NJDEP Groundwater Remediation Standards are the Groundwater Quality Standards (GWQS), N.J.A.C. 7:9C, and, if applicable.
- NJDEP vapor intrusion groundwater screening levels listed in the Vapor Intrusion Technical Guidance dated January 2018, if applicable.

The effective implementation of the NJDEP regulations will be managed by an LSRP to be retained by the Township.

4.0 EVALUATION OF CLEANUP ALTERNATIVES

The USEPA grant funds will be used to fund characterization and removal of solid and hazardous waste from the site, removal of the ASTs, closure and removal of USTs and the surface water impoundment structure formerly used to dispose of process wastewater from the former site operations. USEPA grant funds will also be used to meet reporting requirements for the Township, NJDEP, and USEPA.

This section identifies the cleanup alternatives that were considered to address the environmental contamination issues at the site. The effectiveness, ability to be implemented, and costs associated with the following potential remedial scenarios were considered:

- Option 1) No action.
- Option 2) Remove solid and hazardous wastes, ASTs and USTs, and surface water impoundment structure, then implement engineering and institutional controls (sitewide fencing and deed notice) to restrict public access to the site.
- Option 3) Remove solid and hazardous wastes, ASTs, USTs, and surface water impoundment structure at the site. This option will remove known onsite sources of soil and groundwater contamination. Conduct groundwater sampling and testing to obtain a Remedial Action Permit for monitored natural remediation and case closure.

A summary of each cleanup alternative is provided in the following sections.

4.1 Option 1

If no environmental action was performed, additional fencing and/or site security would be required at the site to prevent public access and potential exposure. In addition:

- The site would be subject to future enforcement actions by NJDEP and/or USEPA.
- Sources of soil and hazardous materials pose continued risks to onsite and offsite groundwater.
- The site will continue as a pest breeding ground requiring ongoing pesticide applications due to the piles of tires and solid/hazardous waste.
- At a minimum, the site would permanently restrict public access and necessitate site surveillance and/or other security measures.

4.1.1 Option 1: Effectiveness

No action would leave ongoing sources of soil and groundwater contamination on site. Soil and groundwater with contaminant concentrations exceeding NJDEP standards would continue to migrate, potentially offsite, and pose potential vapor concerns and human health hazards to the community. Soil waste left on site would continue to pose potential human health concerns due to pest and mosquito breeding. Option 1 is not a viable course of action.

4.1.2 Option 1: Implementation

Option 1 is not technically feasible.

4.1.3 Option 1: Cost

The costs to complete Option 1, no action, only include additional site fencing and/or site security and is estimated to be \$40,000 to \$50,000. Annual maintenance will be required.

4.2 Option 2

The site remediation will include the primary tasks:

- Characterization and removal of the solid and hazardous waste from the property including several drums, buckets and containers containing potentially hazardous material.
- Removal of the ASTs from the property. ASTs have been observed to contain volumes of unknown, potentially hazardous materials; and removal of USTs from the property.
- Removal of the surface impoundment structure including unknown, potentially hazardous materials currently contained within the surface impoundment.
- Implementation of institutional and engineering controls (fencing and deed notice) to restrict public access and prevent human or animal contact with the contaminated media.

4.2.1 Option 2: Effectiveness

In this option, the known sources of the onsite contamination, solid waste, hazardous waste, ASTs, USTs, and the surface impoundment, would be removed. However, impacted soil and groundwater would remain and may continue to migrate and pose a potential vapor concern. Site access would be permanently limited.

4.2.2 Option 2: Implementation

Option 2 involves technologies and equipment that can be used or operated by several licensed New Jersey contractors skilled in the removal and disposal of hazardous material, ASTs, USTs, and contaminated media. The construction of fencing, concrete caps, and other engineering and institutional control methods can also be completed by many licensed New Jersey contractors. Option 2 would achieve limited remediation but may not provide a desirable outcome for the community.

4.2.3 Option 2: Cost

Preliminary estimates presume the waste codes to be used for disposal of the solid and hazardous waste from the property and the volume and characterization of the material remaining in the ASTs and USTs and surface impoundment onsite. The budgetary estimated cost for Option 2 is \$500,000 plus the costs of the engineering and institutional controls at the site which would range from \$250-350,000 for installation and long term (30 year) management.

4.3 Option 3

The site remediation will include the following primary tasks:

- Characterization and removal of the solid and hazardous waste from the property including several drums, buckets, and containers containing potentially hazardous material.
- Removal of the ASTs from the property. ASTs have been observed to contain volumes of unknown, potentially hazardous materials.
- Removal of USTs from the property. USTs have been observed to contain volumes of unknown, potentially hazardous materials.
- Removal of the surface impoundment structure including unknown, potentially hazardous materials currently contained within the surface impoundment. Historically, the surface impoundment was noted to discharge directly to the sanitary sewer system.
- Groundwater sampling and analysis to obtain a Remedial Action Permit for monitored natural attenuation prior to case closure.

VHB has secured \$246,000 of funding from the NJDEP Hazardous Site Remediation Fund (HDSRF) to continue the remedial investigation and site remediation. The remediation under this alternative will result in removal of contaminants leaching into soil, groundwater, and ecological receptors following extreme weather events.

4.3.1 Option 3: Effectiveness

The effectiveness of Option 3 would be immediate due to the following factors:

- Removal of the solid and hazardous waste, ASTs, USTs, and surface impoundment would effectively remove the current known sources of contamination of soil and groundwater on the property.
- Removal of the above listed items will allow for the remedial investigation and remedial action work to proceed and will facilitate groundwater cleanup via monitored natural attenuation.

4.3.2 Option 3: Implementation

Option 3 can be implemented with technologies and equipment that can be used or operated by several licensed New Jersey contractors skilled in the removal and disposal of hazardous material, ASTs, USTs, and contaminated media. Hamilton Township is currently working with VHB staff licensed in the required disciplines to oversee the work.

4.3.3 Option 3: Cost

Preliminary estimates presume the waste codes to be used for disposal of the solid and hazardous waste from the property. The volume and characterization of the material remaining in the ASTs

and USTs and surface impoundment were estimated based on current data. The budgetary estimated cost for Option 3 is \$500,000.

4.4 Preferred Alternative

The preferred alternative is:

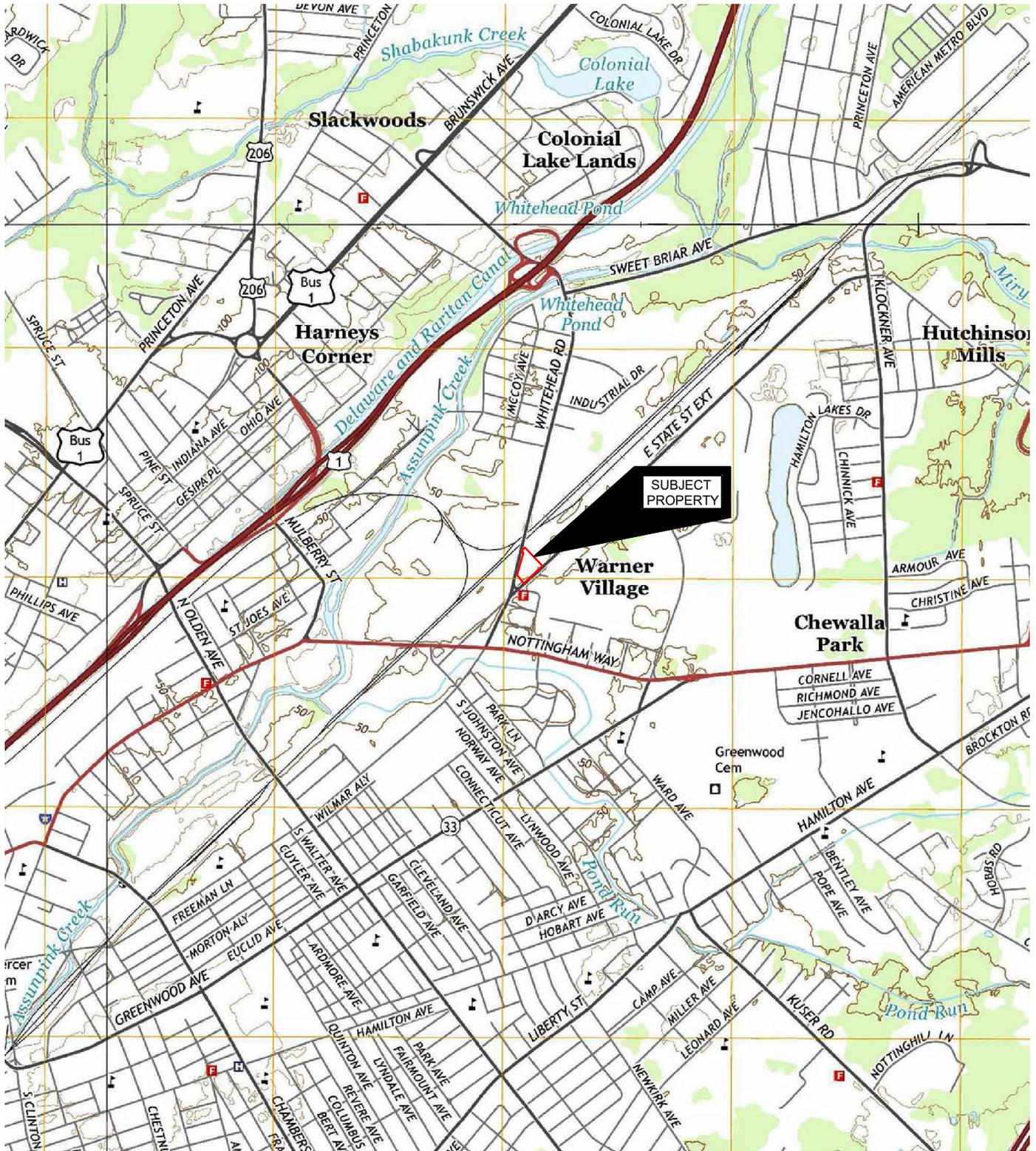
- **Option 3: Removal of solid and hazardous wastes, ASTs, USTs, and the surface water impoundment structure, groundwater monitoring and permitting**

The selected alternative will allow the unrestricted use of the property. The methods used are proven methods, can be readily implemented, are environmentally effective, and cost-effective. The supplies, equipment and materials needed are readily available, as is the skilled labor. The remedy is compatible with the future land use goals for the site which may include use as part of an Arts District, industrial/commercial development, and/or recreational/open space. This remedy can be completed within the timeframe of the USEPA Brownfield Grant.

Option 1: Option 1 (no action) was not selected because soil waste, ongoing sources of contamination, and a blighted, inaccessible property would remain. Option 3 would be an undesirable outcome for the community.

Option 2: Option 2 was not selected because it does not guarantee the removal of sources of contamination groundwater contamination which would require continued oversight. Option 2 includes a Deed Notice as an institutional control, and engineering control (fencing) to restrict the use and access to the property, which are undesirable outcomes for the community.

Figures



SCALE: 1" = 24,000
 PHOTO REVISED: 2014

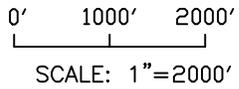


FIGURE 1 - SITE LOCATION MAP
 U.S.G.S. TOPOGRAPHIC TRENTON EAST, NJ QUAD
 1849 EAST STATE STREET
 BLOCK 1636, LOT 4
 HAMILTON, MERCER COUNTY, NEW JERSEY

DATE: 10/27/21	JOB NO.: 21178.01	SCALE: 1" = 2000'
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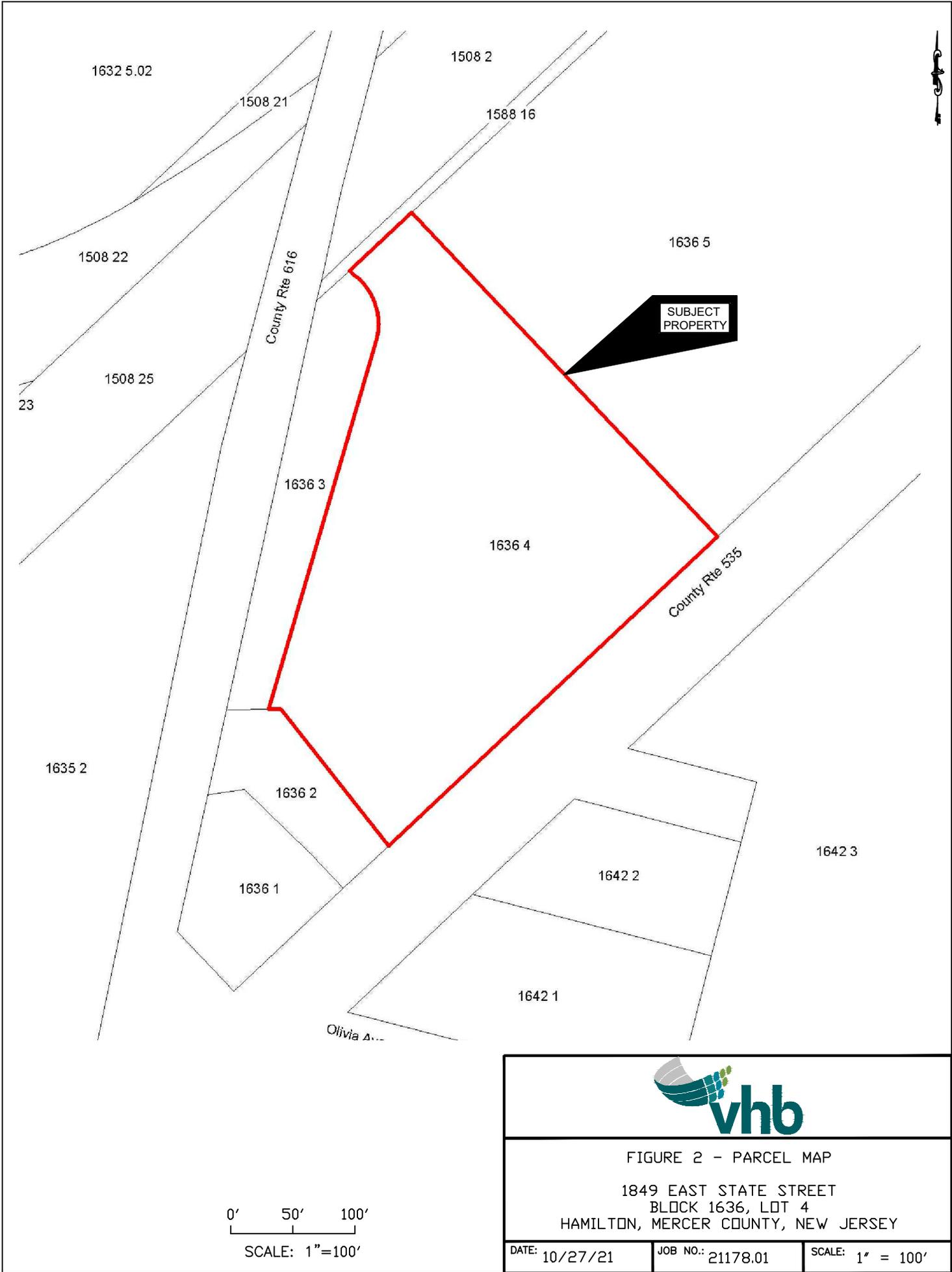


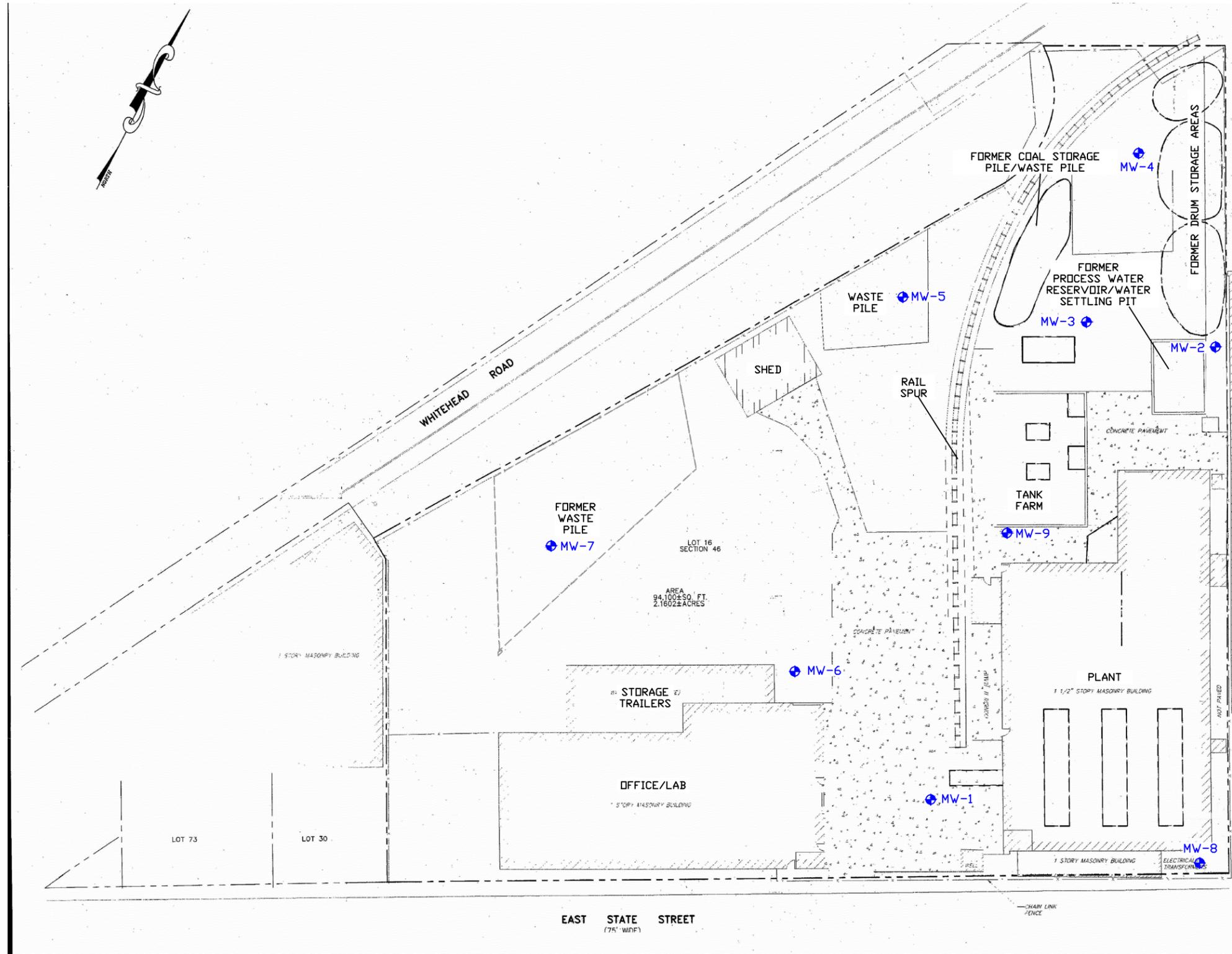
FIGURE 2 - PARCEL MAP

1849 EAST STATE STREET
 BLOCK 1636, LOT 4
 HAMILTON, MERCER COUNTY, NEW JERSEY

DATE: 10/27/21

JOB NO.: 21178.01

SCALE: 1" = 100'



LEGEND

- MONITORING WELL LOCATION
 MW-1

REFERENCE DRAWING:
 PMK GROUP CONSULTING AND ENVIRONMENTAL ENGINEERS
 SAMPLE LOCATION MAP
 DATED: 12/22/04

0' 25' 50'
 SCALE: 1" = 50'



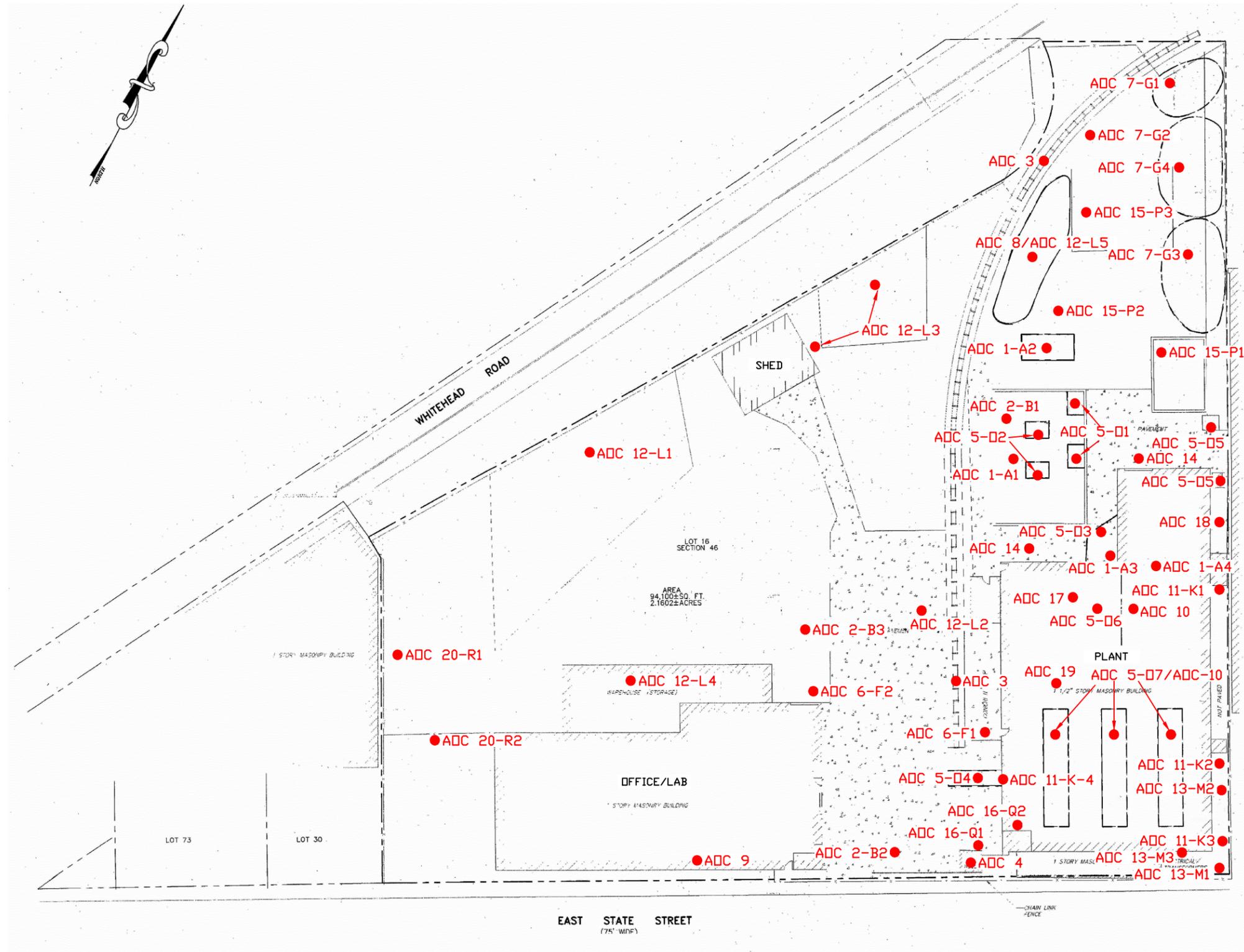
FIGURE 3 - SITE FEATURES MAP

1849 EAST STATE STREET
 BLOCK 1636, LOT 4
 HAMILTON, MERCER COUNTY, NEW JERSEY

DATE: 10/27/21

JOB NO.: 21178.01

SCALE: 1" = 50'



LEGEND	
ADC 1	- AST (A1-A4)
ADC 2	- UST (B1-B3)
ADC 3	- RAIL LINES, SPURS OR SIDINGS
ADC 4	- ABOVE GROUND PUMP STATION
ADC 5	- SUMPS/PITS (Q1-Q7)
ADC 6	- LOADING/UNLOADING AREA (F1-F2)
ADC 7	- DRUM STORAGE AREA (G1-G4)
ADC 8	- STORAGE AREA - COAL
ADC 9	- CHEMICAL STORAGE CABINETS (CLOSED)
ADC 10	- TRENCHES OR FLOOR DRAINS
ADC 11	- ROOF LEADER (K1-K4)
ADC 12	- WASTE PILES (L1-L5)
ADC 13	- TRANSFORMERS (M1-M3)
ADC 14	- UNDERGROUND PIPING
ADC 15	- SURFACE IMPOUNDMENT (P1-P3)
ADC 16	- PRODUCTION WELLS (Q1-Q2)
ADC 17	- BOILER ROOM
ADC 18	- AIR VENTS AND DUCTS
ADC 19	- HAZARDOUS DUST (THROUGHOUT PLANT BUILDING)
ADC 20	- WASTE STORAGE AND STAGING AREA (R1-R2)
ADC 21	- GROUNDWATER (SITEWIDE)
ADC 22	- BUILDING CONDITIONS

REFERENCE DRAWING:
 PMK GROUP CONSULTING AND ENVIRONMENTAL ENGINEERS
 SAMPLE LOCATION MAP
 DATED: 12/22/04

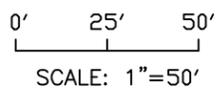




FIGURE 4 - AREA OF CONCERN MAP

1849 EAST STATE STREET
 BLOCK 1636, LOT 4
 HAMILTON, MERCER COUNTY, NEW JERSEY

DATE: 10/27/21	JOB NO.: 21178.01	SCALE: 1" = 50'
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