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State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Bureau of Southern Field Operations

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FEB - 1 REC'D

BOB MARTIN
Commissioner

CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

January 24, 2012

Sandra Ross Johnson, Executive Director
Camden Development Agency - City Hall
520 Market Street, Suite 1300
PO Box 95120
Camden, NJ 08101

Approval

Re: Remedial Action Work Plan and New Jersey Pollutant Discharge Elimination System/Discharge to Ground Water Permit-By-Rule Request
North Front Street Associates (a.k.a. ABC Barrel Co. & AABCO Steel Drum Site)
308 - 322 North Front Street
Camden City, Camden County
Block 62.01; Lots 1 to 4
Block 62; Lots 17 to 20
Block 62.02; Lots 25 & 26
Block 65; Lots 38 & 45
SRP PI#: 006594
EA ID #: SUB110001
BFO File Number: 04-08-58

Dear Ms Ross Johnson:

The New Jersey Department of Environmental Protection (Department) has completed review of the Remedial Action Work Plan received on November 16, 2011. The Department has determined that the Remedial Action Work Plan is in compliance with the Technical Requirements for Site Remediation, N.J.A.C. 7:26E and other applicable requirements. The Department hereby approves the Remedial Action Work Plan, effective the date of this letter.

This New Jersey Pollutant Discharge Elimination System/Discharge to Ground Water (NJPDES/DGW) permit-by-rule discharge approval is hereby issued under the authority of the New Jersey Water Pollution Control Act, N.J.S.A. 58:10A-1 et seq. and the implementing regulations, N.J.A.C. 7:14A-1 et seq. Pursuant to N.J.A.C. 7:14A-22.4(b)5, a Treatment Works Approval is not

required for discharges to ground water authorized pursuant to N.J.A.C. 7:14A-7.5(b) and contained in this letter. Be advised that the time period for the discharge begins on the day the discharge first occurs, not on the date the discharge approval letter is issued or received.

Consistent with N.J.A.C. 7:14A-7.5(b)3 the approved discharge to ground water is related to dewatering at a contaminated site or regulated underground storage tank facility and is not to exceed 180 calendar days.

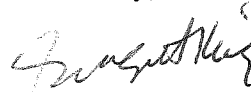
Please be aware that on May 7, 2009 the Site Remediation Reform Act (SRRA) was enacted. SRRA establishes criteria for the licensing of site remediation professionals, known as LSRP's, who will assure that contaminated sites are remediated in accordance with all prevailing statutes, regulations and guidance. The timeframes and criteria that define when a LSRP must be hired, as well as other requirements of SRRA have been reflected in the ARRCS Rule and Tech Rule adopted on November 4, 2009. These rules can be found at <http://nj.gov/dep/srp/regs/>. All parties who initiated remediation prior to November 3, 2009 will not be required to hire a LSRP to conduct the remediation right away. Remediation will follow the remediation process with traditional NJDEP oversight and approvals until 2012. All parties remediating sites on or after May 7, 2012 will be required to follow N.J.S.A. 58:10B-1.3b 1-9 and hire an LSRP.

Please be advised that based upon the Department's review of your file, it is our opinion that the remediation will not be completed, reports submitted and evaluated for this site before the May 7, 2012 deadline. Therefore it will be necessary for you to complete the remediation under the LSRP program. Information regarding opting into the LSRP program can be found at http://www.nj.gov/dep/srp/srra/l srp/opt_in.htm.

It is important to note that there are regulatory and mandatory timeframes that started March 1, 2010 that may apply to this site. Guidance for this topic can be found at http://www.nj.gov/dep/srp/srra/training/matrix/new_responsib/6_timeframe_req.pdf. Your failure to meet a mandatory timeframe will subject you to direct oversight pursuant to N.J.S.A. 58:10c-27.

Thank you for your cooperation in this matter. If you have any questions, call Cheryl Priest at (609) 292-2723.

Sincerely,



George King, Bureau Chief
Bureau of Southern Field Operations

cc: Clerk, Camden City
Camden County Health Department
Dresdner Robin
BFO File Number: 04-08-58