

July 10, 2008 Proposal # 07-10-18 Revised

Mr. James Harveson Camden Redevelopment Agency City Hall, Suite 1300 P.O. Box 95120 Camden, NJ 08101-5120

Attention: Mr. Harveson

RE: CAMDEN REDEVELOPMENT AGENCY

REVISED PROPOSAL FOR GROUNDWATER REMEDIAL INVESTIGATION/REMEDIAL ACTION WORKPLAN

ABC BARREL COMPANY SITE, BLOCK 62 LOTS 38/44, CAMDEN, NJ

Dear Mr. Harveson:

DRESDNER ROBIN is pleased to submit this revised proposal and work plan to the Camden Redevelopment Agency (CRA) for Environmental Consulting Services for the above site - in support of the CRA's redevelopment and revitalization efforts. This revised proposal has been prepared to address comments from the New Jersey Department of Environmental Protection (NJDEP) in an E-mail dated June 27, 2008, regarding the "Proposal for Groundwater Remedial Investigation/Remedial Action Workplan", dated February 28, 2008, for the ABC Barrel Company Site.

A summary of the previous proposals submitted to the CRA on this project were:

- ➤ Initial proposal dated September 19, 2006 for Area of Concern (AOC) B1 and Site Investigation Report approved and funded through the HDSRF program in the amount of \$19,047.
- > Second proposal dated October 18, 2007 in the amount of \$41,330 prepared at your request based upon discussions held at the October 17, 2007, meeting for the ABC Barrel Company Site. This work was not funded and was put on hold pending further discussions with the Coopers Grant Neighborhood Association (CGNA).
- ➤ Third Proposal dated February 28, 2008, in the amount of \$77,880 prepared at the request CRA and CGNA to addresses the remaining groundwater contamination and remediation strategy required for Development Option#2 (Historic Fill to be removed from all proposed residential Lots only).

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At an October 17, 2007 project meeting, DRESDNER ROBIN presented the results of the groundwater screening investigation that was conducted at the ABC Barrel Site to address NJDEP's requirements for a groundwater investigation at Area of Concern AOC B1 (Former 8,000 Gallon Diesel UST). The screening investigation was conducted on September 9, 2007, and included the collection and analysis of a groundwater sample from a temporary well installed within the former UST excavation area. The results of the investigation indicated that several polynuclear aromatic hydrocarbon (PAH) organic compounds and total tentatively identified volatile organic (VO) and Base Neutral (BN) organic compounds (TICS) were present in the screening sample exceeding the NJDEP Groundwater Quality Standards (N.J.A.C. 7::9-6). Furthermore, an intermittent sheen was observed on the purge water during the groundwater screening.

Based upon **Dresdner Robin's** interpretation of the groundwater screening data, the PAH contamination detected in groundwater is most likely attributable to impacts from "historic fill" materials previously identified at the Site, and <u>not</u> the result of impacts from the former UST. Although the VO TICS and sheen observed during collection of the screening sample was presumably the result of impacts from the former diesel UST, no further remedial actions regarding the sheen appear to be required since the conditions at the site/AOC are consistent with the NJDEP "Sheen" Remediation Policy Initiative, dated February 1, 2006.

Two possible remedial options for the PAH-impacted groundwater were discussed at the October 17, 2007 meeting that would comply with the requirements of the NJ *Technical Requirements for Site Remediation*. These options were: 1) Implementation of a Groundwater Classification Exception Area (CEA) for the Site; and/or 2) Conducting further groundwater investigations at the site to confirm the screening results and delineate the contamination, if necessary. At the meeting it was concluded that further groundwater investigation would be advantageous to the Site since a CEA would <u>not</u> be required if the PAH contamination was not confirmed, and at worst, a CEA would be most likely required for the Site.

Also, at the October 17, 2007 meeting, DRESDNER ROBIN requested that CRA provide any additional information pertaining to the previous remedial actions conducted at the ABC Barrel Company Site by other consultants/contractors. The additional information, if any, would be used to fill in data gaps for the Remedial Action Report for the site. To address this issue, it was agreed by all parties that that a NJDEP File Search may be useful in providing additional information for the RAR Report.

At a January 17, 2008 meeting regarding the project, three development options (see attached) were discussed:

- 1. Option 1 Unrestricted Use Option. Historic Fill to be removed from the entire site, backfilled with certified clean fill and capped with 2 feet of landscaped materials/1 foot of concrete and/or asphalt (Estimated Cost \$2.81 M).
- 2. Option 2 Development Option. Historic Fill to be removed from all proposed residential Lots only. Remaining park area (to be owned by the City) to be capped with 2 feet of landscaped materials/1 foot of concrete and/or asphalt (Est. Cost \$2.15 M).



3. Option 3 – No Build/Park Option. No buildings on any private lots or any part of the Site and the entire Site is converted to a park capped with 2 feet of landscaped materials/1 foot of concrete and/or asphalt (Estimated Cost \$0.42 M).

At the conclusion of the meeting it was decided that Development Option #2 was the preferred option and CRA and CGNA requested the preparation of a proposal that addresses the remaining groundwater contamination and remediation strategy required for Development Option#2. Our approach for completing the scope of work in support of Development Option #2 is presented below.

The proposed work includes the following tasks:

- Task 1 NJDEP File Review
- Task 2 Confirmation Phase Monitoring Well Installation (MW-4) and Groundwater Sampling (1 Round/1 Well)
- Task 3 Delineation Phase Monitoring Well Installation (MW-5, MW-6, and MW-7) and Groundwater Sampling (2 Rounds/7 Wells) (If required)
- Task 4 Well Surveying/Form Bs
- Task 5 Disposal of Investigation Derived Waste
- Task 6 Update of Remedial Investigation Report
- Task 7 Prepare Remedial Action Workplan/Draft Deed Notice
- Task 8 Draft Groundwater Classification Exception Area (CEA) (If required)
- Task 9 Project Management and Coordination

For completing the groundwater portion of the project, the proposed field work will be implemented in two phases consisting of a confirmation phase followed by a delineation phase, if required. This is recommended because if the PAH contamination is <u>not</u> confirmed by sampling data collected from a permanent monitoring well, then additional well installation and further remedial investigation of groundwater will not be necessary. In this case, DRESDNER ROBIN will recommend that a No Further Action for groundwater be requested from NJDEP for the site. Please note that in Task 3, well abandonment/well replacement is being proposed for existing well MW-1 because the well was noted to be damaged and replacement of the well may be necessary to sample the well.

The proposed work will be conducted in accordance with the NJDEP *Technical Requirements for Site Remediation*, more specifically, N.J.A.C. 7:26E-4 (Remedial Investigation). The details of the proposed work and cost proposal are presented below.

Task 1 NJDEP File Review

As discussed above, a NJDEP File Review will be conducted under the Open Public Records Act (OPRA) to obtain additional information pertaining to previous remedial investigations and remedial actions conducted at the Site. Copies of pertinent reports, work plans, maps. etc., will be made during the file search at NJDEP's offices in Trenton, New Jersey. The information obtained will be reviewed by DRESDNER ROBIN and incorporated into the RIR/RAS as appropriate.



Task 2 Confirmation Phase Monitoring Well Installation (MW-4) and Groundwater Sampling (2 Rounds/1 Well)

Further investigation of volatile organic (VO) and Base Neutral (BN) compounds is warranted to address concentrations of several BN compounds and total tentatively identified compounds (TICS) for VO and BN that were detected at 509.5 ppb, which exceeds the Interim Generic Ground Water Quality Criteria of 500 ppb. As required by NJDEP, a minimum of two sampling events will be conducted to demonstrate that total VO and BN are below the regulatory criteria at groundwater screening location GW-1 (AOC B1 former 8,000 gal. Diesel UST).

The confirmation phase of the work will include the following subtasks:

- Installation of Monitoring Well MW-4
- Collection and analysis of a minimum of two (2) groundwater samples from MW-4

Confirmation Well Installation (MW-4)

Monitoring Well MW-4 would be installed adjacent to the groundwater screening locations GS-1 as shown on Figure 1. Tabasco Drilling, a NJ-Certified well driller, will install the monitoring well.

Proposed monitoring well MW-4 will be constructed in accordance with the requirements of the NJDEP *Field Sampling Procedures Manual* (August 2005). The well construction will consist of 4-inch PVC slotted well screen and compatible size filter pack. The screen will be set at approximately 7 to 17 feet below the existing ground surface. Surface construction will consist of a flush mount steel casing set in a concrete pad.

The well will be developed to turbid free conditions to the extent practical. Investigation derived waste (soil and groundwater) will be managed on-site and disposed off-site in accordance with the criteria of the NJDEP *Field Sampling Procedures Manual* and as described in Task 5.

Reconstruction/Abandonment/Replacement of MW-1

During the groundwater screening investigation, the stick-up surface casing of existing monitoring well MW-1 was noted to be damaged and will need to be replaced. DRESDNER ROBIN'S Certified Driller will inspect the well casings and make a determination as to the integrity of the subsurface details of the well. If the subsurface detail of the well is damaged, the well would be sealed and the monitoring well replaced. At a minimum, the monitoring well pad and surface casing of the well will be reconstructed. The surface details will consist of flush mount surface casing and concrete pad, which will minimize potential damage to the well from future site activities. The reconstruction of MW-1 will be conducted prior to collection of water levels measurements in the Site monitoring wells as described below.



Confirmation Sampling and Analysis

Two (2) groundwater sample would be collected from proposed monitoring well MW-4. The initial sample would be collected a minimum of 2 weeks after development of proposed monitoring well MW-4. The second sample would be collected approximately 1 month following the initial sample to confirm the results of the initial sample.

During the proposed groundwater sampling, a water level measurement would be collected from MW-4 and from existing monitoring wells MW-1 through MW-3 utilizing an electronic water level meter. Immediately after opening the well caps, a photoionization detection meter (PID) would be used to measure the presence of volatile organic vapors in the well.

The groundwater samples would be collected in accordance with the procedures and protocol detailed in the NJDEP's *Field Sampling Procedures Manual* (May 1992). To collect the most representative sample of groundwater, the Low Flow Purging and Sampling Method will be used.

The groundwater samples would be analyzed by a NJ-Certified laboratory for the following contaminants of concern:

- GC/MS Volatile Organic Compounds (SW846 8260B)
- GC/MS Semi-Volatile Organic Compounds (SW 846 8270S by SIM).

An accelerated sample turnaround time will be used for the sample analysis (one week with 2 day preliminary results) so that implementation of the remedial investigation program can be accelerated, if necessary.

Field quality assurance-quality control (QA/QC) samples would be collected in accordance with N.J.A.C. 7:26E-2.1 of the *Technical Requirements for Site Remediation*. The QA/QC samples would include analysis of a daily field blank and one (1) replicate sample for VO and BN organic compounds. The laboratory deliverables will be NJ-Reduced data deliverables format.

Task 3 Delineation Phase Monitoring Well Installation (MW-5, MW-6 and MW-7) and Groundwater Sampling (2 Rounds/7 Wells) (If Required)

If the results of the confirmation sampling (Task 2) indicates that VO and/or BN organic compounds are present in groundwater exceeding the NJDEP Remediation Standards, then a remedial investigation would be required to delineate the contamination. The remedial investigation would be conducted to delineate the VO and/or BN organic contamination in the water table aquifer at the Site, which is located within the "historic" fill materials. Significant vertical migration of contamination is not anticipated based upon the nature of the contamination and the hydrogoelogic setting in the project area (i.e., adjacent to the Delaware River, a major discharge zone).



The delineation phase of the work (if required) would include the following subtasks:

- A limited Geophysical Survey
- Installation of Monitoring Wells MW-5, MW-6, and MW-7
- Reconstruction/Abandonment/Replacement of MW-1
- Collection and analysis of 2 rounds for groundwater samples from MW-1 through MW-7

Limited Geophysical Survey

A qualified geophysical subcontractor will be used to conduct a geophysical survey in the vicinity of the proposed well locations. The purpose of the geophysical survey will be to identify subsurface features such as utility lines or anomalies such as buried metallic objects that could potentially interfere with the drilling activities. The geophysical survey will employ electromagnetic and ground penetrating radar methods.

A minimum area of 20 feet radius will be cleared around each potential boring/well location. The subcontractor will prepare a Geophysical Survey Report summarizing the work performed that will include mapped locations of subsurface features and anomalies detected.

Delineation Well Installation (MW-5, MW-6, and MW-7)

Proposed monitoring wells MW-5, MW-6, and MW-7 will be installed southwest and northwest, and east of proposed monitoring well MW-4 and screening location GS-1 (Figure 1). Tabasco Drilling, a NJ-Certified well driller, will install the monitoring wells. The monitoring well construction details and installation procedures for the delineation phase wells will be the same as described above in Task 2.

Delineation Well Sampling and Analysis

Approximately 2 weeks following the installation of the delineation phase monitoring wells, a round of water level measurements and groundwater samples will be collected from monitoring wells MW-4, MW-5, and MW-6 <u>plus</u> existing monitoring wells MW-1, MW-2, and MW-3. The monitoring well sampling procedures and analytical protocols for the delineation phase groundwater sampling will be the same as described above in Task 2.

Sample turnaround time will be the standard 3 weeks turnaround. After receipt of the data, DRESDNER ROBIN will review the data to determine if the concentrations of VO and/or BN organic compounds exceed the Groundwater Remediation Standards. After consultation with CRA, a second round of samples may be collected approximately one (1) month after the initial round to confirm the sampling results.



Task 4 Well Surveying/Form B's

The existing/proposed monitoring well locations and elevations will be surveyed and a Form B *Monitoring Well Certification* prepared for each of the wells in accordance with NJDEP requirements. The monitoring well surveying and preparation of the Form B's would be performed by DRESDNER ROBIN'S Professional Land Surveyor.

Task 5 Disposal of Investigation Derived Waste

Drill cuttings generated during installation of the proposed wells are expected to include "historic" fill materials, which are presumed to be regulated waste. The drill cuttings will be stored on site at a centralized location in secured 55-gallon drums. If free product (a sheen) is detected during development or purging of the monitoring wells, the impacted well water will also be stored in secure 55-gal. drums. Dresdner Robin will subcontract a NJ-Licensed Waste Hauler to remove and dispose of the drums off-site in accordance with the applicable environmental laws and regulations.

Task 6 Update of Remedial Investigation Report

DRESDNER ROBIN'S existing and approved scope of work for the ABC Barrel Company Site includes the preparation of an RIR Report. Under this new task, the RIR will be updated to include the results of the proposed groundwater investigations.

The RIR will be prepared in accordance with the requirements of N.J.A.C. 7:26E-4.8 (Remedial Investigation Report) and 7:26E-6.7 (Remedial Action Report). The RIR report will include specific recommendations for each AOC, including either a request for "No Further Action" or stating that "further remedial actions will be required". Future remedial actions for the site are likely to include Institutional and Engineering Controls in the form of an engineering cap and a Deed Notice, and possibly a Groundwater Classification Exception Area (CEA), depending upon the results of the proposed remedial investigation.

A Draft copy of the RIR Report will be submitted to CRA for review and comment. After addressing CRA's comments, a Final RIR Report will be prepared for review and comment by NJDEP. This task also includes costs for addressing one round of a reasonable level of comments from the NJDEP regarding the RIR for the Site.

Task 7 Meeting with NJDEP (approved and budgeted for as part of previous scope)

CRA and DRESDNER ROBIN would meet with the NJDEP to discuss their comments of the RIR/RAR and the proposed remedial approach for the Site to ensure agreement with these approaches prior to the preparation of the Remedial Action Workplan and associated Deed Notice. In the past this strategy has saved a lot of time and money by avoiding the need for repeat submissions and/or revisions to Workplans etc.



Task 8 Remedial Action Workplan and Draft Deed Notice

Following approval of the RIR Report and the agreed-upon approaches discussed at the NJDEP meeting, DRESDNER ROBIN would prepare the Remedial Action Work Plan (RAWP) for the Site detailing the remedial actions required to obtain a No Further Action Letter for Development Option #2.

At a minimum, the Remedial Action will include the following components:

- Excavation of all Historic Fill within the Site and to the property boundaries of proposed builing lots
- Shoring and dewatering as necessary to facilitate the proposed construction
- Backfilling of excavations with certified clean fill to site grade
- Capping of the central open space/recreation areas with soil cap, asphalt driveway, landscaping and implementation of a Deed Notice (institutional controls)

If groundwater contamination is confirmed and delineated during the proposed groundwater investigation of AOC B2, the RAWP may address the contamination by proposing a Natural Groundwater Remediation Strategy in conjunction with a Classification Exception Area (CEA).

The RAWP and Deed Notice will be prepared in accordance with the requirements of N.J.A.C. 7:26E-6.7 (Remedial Action Report) and 8.2 (Deed Notice).

Task 9 Draft Groundwater Classification Exception Area (CEA)(If Required)

If groundwater contamination is confirmed, DRESDNER ROBIN will utilize the site groundwater data and prepare a Draft CEA in accordance with NJDEP 7:26E Technical Requirements for Site Remediation (TRSR) and applicable NJDEP Guidance. Two-dimensional groundwater modeling may be used to demonstrate the extent of the contamination and determine whether or not annual groundwater sampling will be required for the duration of the CEA.

Task 10 Project Management and Coordination

Additional project management and coordination with CRA and NJDEP will be required in support of the proposed work. Included in this task are costs for three (3) additional project meetings that will be attended by the Project Director, Mr. Geoffrey Forrest, and the Project Manager, Raymond Glover.

SCHEDULE

The proposed work activities will begin within one (1) week after HDSRF funding is secured for the groundwater investigation and following receipt of a Notice to Proceed from CRA. An estimate of the time required to complete the additional activities is as follows:



- NJDEP File Search 2 weeks
- Confirmation Phase 4 weeks
- Delineation Phase 6 weeks
- Update of RIR 6 weeks
- Draft RAW/DN/CEA 8 weeks
 TOTAL TIME = 26 weeks

The above estimated time assumes no significant delays due to site access, CRA or NJDEP review times or regulatory issues.

If you have any questions or need additional information, please give me a call at 856 968 9400 or Ray Glover at 201 217 9200 ext. 228.

Sincerely,
DRESDNER ROBIN

Geoffrey R. Forrest P.G., C.P. Eng. Director of Environmental Services

Attachments

Cc: J. Harveson - CRA

N Santiago - CRA File 07-10-18 Chrono



CAMDEN REDEVELOPMENT AGENCY ABC BARREL COMPANY SITE - REMEDIAL INVESTIGATION/REMEDIAL ACTION REVISED COST ESTIMATE - JULY 2008

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CAMDEN REDEVELOPMENT AGENCY ABC BARREL COMPANY SITE - REMEDIAL INVESTIGATION/REMEDIAL ACTION REVISED COST ESTIMATE - JULY 2008

TASK DESCRIPTION	CONSC	JLTANT FEES	FEES			DIRECT EXP	DIRECT EXPENDITURES			
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Task 9 - Draft Groundwater CEA										
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-determine duration of CEA	Env. Scientist	\$105	4	\$420	Surveyor	SO PPE/Disposables	OS.	SO Waste Classification	8 8	
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