

May 15, 2023

Delivered via e-mail: Tames.Pam@epa.gov, dmiller@qhclaw.com, Rosoff.David@epa.gov

Ms. Pamela Tames
Mr. David Rosoff
U.S. Environmental Protection Agency
290 Broadway - 20th Floor
New York, NY 10007-1866

Re: Progress update Letter 1
366-394 Wilson Avenue, Newark, NJ (the Site/Property)
General Facility Tracking Identification # NJN986663052

Dear Mr. Rosoff and Ms. Tames:

This letter summarizes the environmental scope of services performed by Envocare Environmental & Facility Management (ENVOCARE) at the above-referenced property after approval of sampling and quality assurance project plan.

COMPLETED SCOPE OF WORK

KICKOFF MEETING/ STOCKPILE DRONE SURVEY

On March 27th 2023, during the kickoff meeting a drone surveillance was conducted for stockpiles A, B, and C. A drone survey report provides an accurate estimation for each volume of stockpile onsite. Volume calculations showed that no changes in the number of samples required. A stockpile Drone Survey Report is provided as [Exhibit A](#).

BACKGROUND AIR MONITORING/COMMUNITY AIR MONITORING

As per the approved community air monitoring plan, three (3) DustTrak II/Ranger™ Aerosol monitors, a Jerome® mercury analyzer, a photo ionization detector (PID) and 1 (one) meteorological station were setup upwind and downwind of the site to monitor background mercury, volatile organic compounds (VOCs), and particulate matter size 10 (PM10) concentrations, and wind direction throughout the day to establish a baseline data.

Background monitoring also conducted from April 24th to April 28th showed VOC vapor readings were reported below background of zero parts per million. Mercury vapor readings were reported below the background of 0.2ug/m³, and PM10 readings were reported below background of 9 parts per million (ppm). [Exhibit B](#) presents the air monitoring data.

During site activities on April 17th and April 18th 2023, the VOCs, mercury vapors were monitored continuously at the start of each workday and recorded for 15 min averages. No exceedances over the action limits set in the community air monitoring plan were observed during each workday.

STOCKPILE SOIL INVESTIGATION

Between April 17th and 18th, 2023, stockpiles were sampled as directed by EPA for waste classification parameters to adhere to Clean Earth Disposal facility acceptance guidelines. In addition to the three stockpiles in the proposed scope of work, two more stockpiles were sampled for waste class parameters as per EPA OSC direction. These stockpiles were labeled stockpiles D and E which were located directly south of stockpile B and another located to the east adjacent to stockpile B respectively. Sample location figure shown in [Figure 1](#).

A total of five (5) samples were taken for stockpile A, seven (7) samples from stockpile B, three (3) samples from stockpile B and two (2) samples each from stockpiles D and E. PID and mercury readings were taken for each soil sample location. The sampling methods and decontamination procedures were used following the guidelines from the Quality Assurance Project Plan. [Table 1](#) presents the depth, PID and Mercury readings for each stockpile sample. The results will be documented in a report for waste classification.

BACKGROUND SOIL INVESTIGATION

On April 17th and April 18th, 2023, background soil investigation was conducted to document the presence of contaminants of concern (mercury, lead and PCB) in Site soil. Fourteen (14) soil samples throughout the site was collected and all soil samples were collected at various depth intervals. [Table 1](#) presents the background soil samples depths, PID and mercury vapor readings. [Figure 1](#) shows background soil samples locations. The results will be documented in a report for background soil samples.

The preliminary soil sample results are being reported to ENVOCARE. We are currently reviewing them.

Please contact the undersigned at (732) 208-0928 if you have any questions or comments.

Kind Regards,

Devang Patel
Project Manager

Attachments:

Exhibit A - Drone Stockpile Survey Report

Exhibit B - Air Monitoring Data

Figure 1 - Sample Location Map

Table 1 - Sample Summary

Exhibit A – Stockpile Drone Survey Report

STOCKPILE REPORT



366 Wilson Ave
Newark, NJ 07105

Prepared For
Shark Transportation Inc.
t/a Mark Veniero Trucking
172-178 Passaic Ave
Belleville, NJ 07109

Prepared By
ENVOCARE
ENVIRONMENTAL & FACILITY MANAGEMENT

1527 Route 27, Suite 105
Somerset, NJ 08873

Project Number: 150709
March 2023

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Exhibits

Exhibit A	Map
Exhibit B	Volume Calculations

1.0 INTRODUCTION

Shark Transportation Inc. (Client) retained Envocare Environmental & Facility Management Inc. (ENVOCARE) for unmanned aerial vehicle (UAV) Stockpile Calculations at the property located 366 Wilson Ave, Newark, NJ 07105 (Site/Property).

UAV Inspection (UAVI), a subsidiary of ENVOCARE, conducted UAV stockpile survey at the site on March 27, 2023. The UAV was launched after approval was received for aerial stockpile scan from the Client and FAA. Photographs of the stockpile are provided in Exhibit A.

2.0 PROPERTY DESCRIPTION

The Property is located at 366 Wilson Ave, Newark, NJ 07105. Envocare is unsure what the stockpiles consists of as they were covered with a tarp. There was a total of 3 Stockpiles that needed to be scanned.

3.0 WEATHER CONDITIONS

The following weather conditions were recorded at the time of survey:

Description: Sunny

Temperature: 48 °F

Rain (measurable precipitation over 24-hour period prior to inspection): No

Wind Speed: 3 mph, up to 10 mph gusts

4.0 EQUIPMENT SPECIFICATIONS AND LIMITATIONS

UAV Model: DJI Matrice 300 RTK

Camara Specifications:

Camera Model:	Zenmuse P1
Effective Pixels:	45MP
Lens:	35mm

5.0 STOCKPILE SCAN

5.1 PREFLIGHT INSPECTION

ENVOCARE conducted a scan of the stockpile and its surroundings. Prior to ENVOCARE operation, ENVOCARE staff conducted preflight assessment for any flight restrictions and any potential hazards.

5.2 UAV SURVEY OBSERVATIONS

ENVOCARE took over 700 photos during the site visit and used photogrammetry to create an orthomosaic and 3-D map of the area. The resolution of the processed images (resolution of the map)

is .3 in/px. This means that each pixel size is equivalent to .3 in. A copy of the map or a view only access can be provided for free at the client's request. This map was used to create the stockpile calculation.

5.3 STOCKPILE CALCULATION

The volume calculation was done using a Linear Fit method. This is the best method to use for this project. Exhibit A shows three different piles that volume was calculated for. Exhibit B shows how much volume needs to be taken out for each pile. We conclude that a total of 727.68 cubic yards will need to be removed. Please account for a deviation of 10-15% for the final grading.

6.0 LIMITATIONS

This report presents ENVOCARE observations of the Stockpile at the time of inspection. The Stockpile cut volume was calculated based on the final grading being the flat ground Please account for a deviation of 10-15%. Additional scanning services will be required if additional material is imported to the site.

Exhibit A - Map



Exhibit B – Stockpile Soil Calculations by Sections

Section	Volume (cubic yards)
Pile A	101.86
Pile B	474.41
Pile C	151.41
Total	727.98
Since final grade is unknown, please assume 10 to 15% in your budget	836

Exhibit B – Background Air Monitoring Data

Wind Direction:

NW

Site: 366-394 Wilson Ave, Newark

Staff:

MO

Date:

4-25-23

Time	Air Monitor 1: 1123A			Air Monitor 2: 1153			Air Monitor 3: 2055		
	VOC(ppm)	Mercury(ug/m3)	PM10(ug/m3)	VOC(ppm)	Mercury(ug/m3)	PM10(ug/m3)	VOC(ppm)	Mercury(ug/m3)	PM10(ug/m3)
08:00									
08:15									
08:30									
08:45									
09:00									
09:15									
09:30									
09:45									
10:00									
10:15									
10:30									
10:45									
11:00									
11:15									
11:30									
11:45									
12:00									
12:15									
12:30									
12:45									
13:00			2.29			3.8			7.85
13:15	0	0.11	1.83	0	0.10	3.14	0	0.12	5.18
13:30	↓	0.15	1.62	↓	0.12	2.98	↓	0.10	3.64
13:45	↓	0.13	1.65	↓	0.09	3.08	↓	0.20	2.59
14:00	↓	0.11	2.08	↓	0.10	3.03	↓	0.14	3.03
14:15	↓	0.10	2.51	↓	0.10	2.87	↓	0.11	2.95
14:30	↓	0.15	2.01	↓	0.10	2.43	↓	0.13	2.43
14:45	↓	0.17	1.76	↓	0.14	2.46	↓	0.11	2.45
15:00	↓	0.19	3.84	↓	0.15	—	↓	0.10	3.04
1515	0	0.10	2.58	0	0.16	—	0	0.10	2.55
1530	0	0.11	2.71	0	0.14	—	0	0.11	3.11
1545	0	0.13	—	0	0.10	—	0	0.11	—

Wind Direction: NW

Site: 366-394 Wilson Ave, Newark

Staff: MG Date: 4-26-23

Time	Air Monitor 1: 1123A			Air Monitor 2: 1153			Air Monitor 3: 2055		
	VOC(ppm)	Mercury(ug/m3)	PM10(ug/m3)	VOC(ppm)	Mercury(ug/m3)	PM10(ug/m3)	VOC(ppm)	Mercury(ug/m3)	PM10(ug/m3)
08:00									
08:15									
08:30									
08:45									
09:00									
09:15									
09:30									
09:45									
10:00									
10:15									
10:30									
10:45									
11:00									
11:15									
11:30									
11:45									
12:00									
12:15									
12:30									
12:45	0	0.02	5.71	0	0.13	NA	0	0.17	7.4
13:00	0	0.07	5.21	0	0.12		0	0.06	6.23
13:15	0	0.11	4.41	0	0.14		0	0.10	5.17
13:30	0	0.03	4.19	0	0.09		0	0.07	4.71
13:45	0	0.09	3.66	0	0.09		0	0.09	3.43
14:00	0	0.07	3.58	0	0.08		0	0.14	4.08
14:15	0	0.11	3.38	0	0.13		0	0.12	3.76
14:30	0	0.08	3.43	0	0.11		0	0.07	4.19
14:45	0	0.03	3.51	0	0.12		0	0.00	4.56
15:00	0	0.07	3.23	0	0.10	✓	0	0.01	4.07

* Air monitor 2 malfunction

Wind Direction: NW

Site: 366-394 Wilson Ave, Newark

Staff: MG Date: 4-27-23

Time	Air Monitor 1: 1123A			Air Monitor 2: 1153			Air Monitor 3: 2055		
	VOC(ppm)	Mercury(ug/m3)	PM10(ug/m3)	VOC(ppm)	Mercury(ug/m3)	PM10(ug/m3)	VOC(ppm)	Mercury(ug/m3)	PM10(ug/m3)
08:00									
08:15									
08:30									
08:45									
09:00									
09:15									
09:30									
09:45									
10:00									
10:15									
10:30									
10:45									
11:00	0	0.02	5.85	0	0.01	6.96	0	0.06	7.56
11:15	0	0.10	5.68	0	0	6.79	0	0.09	7.47
11:30	0	0.09	6.63	0	0.01	6.31	0	0.06	7.54
11:45	0	0.02	5.54	0	0.02	6.65	0	0.06	7.25
12:00	0	0.03	5	0	0.09	6.12	0	0.15	6.15
12:15	0	0.12	5.1	0	0.09	5.63	0	0	5.95
12:30	0	0.10	4.7	0	0.07	5.36	0	0.12	5.3
12:45	0	0.13	4.3	0	0.02	5.08	0	0.13	4.89
13:00	0	0.04	3.74	0	0.03	4.29	0	0.09	4.04
13:15	0	0.09	3.4	0	0.07	3.85	0	0.04	4.07
13:30	0	0.00	3.24	0	0.09	3.65	0	0.13	3.9
13:45	0	0.04	3.46	0	0.08	3.87	0	0.11	4.13
14:00	0	0.05	3.26	0	0.07	3.74	0	0.10	3.73
14:15	0	0.13	3.62	0	0.05	3.98	0	0.12	4.04
14:30	0	0.07	3.99	0	0.04	4.54	0	0.10	4.48
14:45	0	0.04	4.45	0	0.01	4.83	0	0.11	4.86
15:00	0	0.07	4.52	0	0.03	4.69	0	0.12	5.19
15:15	0	0.10	4.33	0	0.09	4.14	0	0.16	5.54

Wind Direction: NW

Site: 366-394 Wilson Ave, Newark

Staff: MG Date: 4-28-23

[illegible]

Exhibit B – Community Air Monitoring Data

Wind direction: NW

Site: 366-394 Wilson Ave, Newark

Staff: CL Date: 4/17/23

Air Monitor 1: 1123A				Air Monitor 2: 1153			Air Monitor 3: 2055		
Time	VOC(ppm)	Mercury(ug/m3)	PM10 (ug/m3)	VOC(ppm)	Mercury(ug/m3)	PM10(ug/m3)	VOC(ppm)	Mercury(ug/m3)	PM10(ug/m3)
08:00	0	0.03	30.42	0	0.02	28.87	0	0.04	13.23
08:15	0	0.00	31.75	0	0.01	40.82	0	0.03	13.18
08:30	0	0.01	20.72	0	0.01	27.02	0	0.02	13.18
08:45	0	0.02	21.75	0	0.02	28.03	0	0.05	13.18
09:00	0	0.00	21.49	0	0.00	26.95	0	0.05	13.18
09:15	0	0.03	22.14	0	0.01	27.02	0	0.04	13.18
09:30	0	0.02	22.18	0	0.01	28.15	0	0.05	13.18
09:45	0	0.00	22.10	0	0.02	27.43	0	0.05	13.18
10:00	0	0.02	24.50	0	0.03	30.36	0	0.06	13.18
10:15	0	0.04	25.52	0	0.05	31.79	2	0.06	13.18
10:30	0	0.02	27.17	0	0.03	33.95	1	0.05	13.18
10:45	2	0.02	28.87	1	0.00	33.80	1	0.06	13.17
11:00	2	0.08	25.34	2	0.06	27.32	1	0.06	13.17
11:15	2	0.06	22.18	2	0.08	22.86	2	0.00	13.15
11:30	2	0.08	12.83	2	0.05	14.59	1	0.00	13.15
11:45	2	0.08	10.59	2	0.06	10.97	0	0.09	13.14
12:00	1	0.06	8.03	1	0.07	7.08	1	0.10	13.14
12:15	1	0.09	3.80	1	0.06	4.16	1	0.10	13.14
12:30	1	0.07	2.74	1	0.09	3.22	1	0.10	13.11
12:45	1	0.08	2.84	1	0.07	3.29	1	0.09	13.12
13:00	1	0.04	2.60	2	0.12	2.99	1	0.07	13.11
13:15	2	0.02	3.40	1	0.08	2.88	1	0.08	13.10
13:30	3	0.08	2.51	3	0.07	2.88	1	0.10	13.08
13:45	3	0.08	2.16	2	0.06	2.42	1	0.11	13.08
14:00	4	0.07	4.03	3	0.07	2.52	2	0.15	13.08
14:15	4	0.14	3.13	4	0.06	2.35	2	0.10	13.07
14:30	3	0.16	2.57	4	0.07	2.24	3	0.09	13.05
14:45	4	0.15	2.90	4	0.06	2.68	4	0.11	13.06
15:00	4	0.17	3.37	3	0.06	2.55	4	0.01	13.06

[illegible]



Scale in Feet

Legend

- ★ Site Location
- Property Boundary
- Pile Location
- Proposed Background Locations
- Proposed Sectioning of Background locations

NOTES:
1. PARCEL DATA OBTAINED FROM NEW JERSEY GEOGRAPHIC INFORMATION NETWORK (NJGIN)
2. PARCEL DATA IS NOT FROM A LICENSED SURVEYOR... AERIAL AND PROPERTY LINE MAY NOT ALIGN
3. SERVICE LAYER CREDITS: COPYRIGHT NEARMAP

1 " = 160 miles

Figure 1
Sample Location Map

366-394 Wilson Avenue
(Block: 5038, Lot: 97)
Newark, New Jersey

Project No: 150405

Date: July 2020

Drawn By: K. Starkes

Checked By: DP

ENVIRONMENTAL & FACILITY MANAGEMENT

Table1-Summary of Soil Samples
366-394 Wilson Avenue, Newark, NJ

Sample ID	Depth(ft)	PID (ppm)	Mercury Vapor Readings (ug/m3)	Sample Time	analysis	sample method
Waste Characterization Sample ID						
Stockpile A						
SPA-1WC_23_04_17	2-5	44	0.24	1015	TCLP/TCL VOCs, EPH Cat 1, TCLP Full minus VOCs, TCL/TAL minus VOCs, Paint Filter RCRA Characteristics	Grab & Composite
SPA-2WC_23_04_17	2-5	7	0	1035	TCLP/TCL VOCs, EPH Cat 1, TCLP Full minus VOCs, TCL/TAL minus VOCs, Paint Filter RCRA Characteristics	Grab & Composite
SPA-3WC_23_04_17	2-5	54	0.14	1100	TCLP/TCL VOCs, EPH Cat 1, TCLP Full minus VOCs, TCL/TAL minus VOCs, Paint Filter RCRA Characteristics	Grab & Composite
SPA-4WC_23_04_17	2-5	22	0	1115	TCLP/TCL VOCs, EPH Cat 1, TCLP Full minus VOCs, TCL/TAL minus VOCs, Paint Filter RCRA Characteristics	Grab & Composite
SPA-5WC_23_04_17	2-5	11	0.04	1130	TCLP/TCL VOCs, EPH Cat 1, TCLP Full minus VOCs, TCL/TAL minus VOCs, Paint Filter RCRA Characteristics	Grab & Composite
Stockpile B						
SPB-1WC_23_04_17	2-5	0	0.79	1200	TCLP/TCL VOCs, EPH Cat 1, TCLP Full minus VOCs, TCL/TAL minus VOCs, Paint Filter RCRA Characteristics	Grab & Composite
SPB-2WC_23_04_17	2-5	0	2.81	1240	TCLP/TCL VOCs, EPH Cat 1, TCLP Full minus VOCs, TCL/TAL minus VOCs, Paint Filter RCRA Characteristics	Grab & Composite
SPB-3WC_23_04_17	2-5	0	1.86	1250	TCLP/TCL VOCs, EPH Cat 1, TCLP Full minus VOCs, TCL/TAL minus VOCs, Paint Filter RCRA Characteristics	Grab & Composite
SPB-4WC_23_04_17	2-5	0	0.22	1300	TCLP/TCL VOCs, EPH Cat 1, TCLP Full minus VOCs, TCL/TAL minus VOCs, Paint Filter RCRA Characteristics	Grab & Composite
SPB-5WC_23_04_17	2-5	0	2.26	1305	TCLP/TCL VOCs, EPH Cat 1, TCLP Full minus VOCs, TCL/TAL minus VOCs, Paint Filter RCRA Characteristics	Grab & Composite
SPB-6WC_23_04_17	2-5	0	3.86	1310	TCLP/TCL VOCs, EPH Cat 1, TCLP Full minus VOCs, TCL/TAL minus VOCs, Paint Filter RCRA Characteristics	Grab & Composite
SPB-7WC_23_04_17	2-5	0	1.76	1315	TCLP/TCL VOCs, EPH Cat 1, TCLP Full minus VOCs, TCL/TAL minus VOCs, Paint Filter RCRA Characteristics	Grab & Composite
SPB-8WC_23_04_17	2-5	0	1.89	1320	TCLP/TCL VOCs, EPH Cat 1, TCLP Full minus VOCs, TCL/TAL minus VOCs, Paint Filter RCRA Characteristics	Grab & Composite
Stockpile C						
SPC-1WC_23_04_17	2-5	0	1.89	1410	TCLP/TCL VOCs, EPH Cat 1, TCLP Full minus VOCs, TCL/TAL minus VOCs, Paint Filter RCRA Characteristics	Grab & Composite
SPC-2WC_23_04_17	2-5	0	2.09	1420	TCLP/TCL VOCs, EPH Cat 1, TCLP Full minus VOCs, TCL/TAL minus VOCs, Paint Filter RCRA Characteristics	Grab & Composite
SPC-3WC_23_04_17	2-5	0	1.66	1430	TCLP/TCL VOCs, EPH Cat 1, TCLP Full minus VOCs, TCL/TAL minus VOCs, Paint Filter RCRA Characteristics	Grab & Composite
Stockpile D						
SPD-1WC_23_04_18	2-5	0	0.13	1015	TCLP/TCL VOCs, EPH Cat 1, TCLP Full minus VOCs, TCL/TAL minus VOCs, Paint Filter RCRA Characteristics	Grab & Composite
SPD-2WC_23_04_18	2-5	0	0.07	1030	TCLP/TCL VOCs, EPH Cat 1, TCLP Full minus VOCs, TCL/TAL minus VOCs, Paint Filter RCRA Characteristics	Grab & Composite
Stockpile E						
SPE-1WC_23_04_18	2-5	1	0.12	0950	TCLP/TCL VOCs, EPH Cat 1, TCLP Full minus VOCs, TCL/TAL minus VOCs, Paint Filter RCRA Characteristics	Grab & Composite
SPE-2WC_23_04_18	2-5	0	0.12	1010	TCLP/TCL VOCs, EPH Cat 1, TCLP Full minus VOCs, TCL/TAL minus VOCs, Paint Filter RCRA Characteristics	Grab & Composite
Background samples ID						
1BG_23_04_17	1-1.5	0	0.15	0915	Lead, Mercury, PCBs	Grab
2BG_23_04_17	1-1.5	0	0.30	0945	Lead, Mercury, PCBs	Grab
3BG_23_04_17	1.5-2	155	0.21	0950	Lead, Mercury, PCBs	Grab
4BG_23_04_17	1-1.5	0	0.16	1515	Lead, Mercury, PCBs	Grab
5BG_23_04_17	1-1.5	0	0.40	1510	Lead, Mercury, PCBs	Grab
6BG_23_04_17	1-1.5	0	0.26	1505	Lead, Mercury, PCBs	Grab
7BG_23_04_17	0.5-1	0	0.19	1520	Lead, Mercury, PCBs	Grab
8BG_23_04_18	0.5-1	0	0.43	0830	Lead, Mercury, PCBs	Grab
9BG_23_04_18	0.5-1	0	0.34	0820	Lead, Mercury, PCBs	Grab
10BG_23_04_17	1-1.5	0	0.20	1445	Lead, Mercury, PCBs	Grab
11BG_23_04_18	0.5-1	0	0.03	0840	Lead, Mercury, PCBs	Grab
12BG_23_04_18	0.5-1	7	0.50	0850	Lead, Mercury, PCBs	Grab
13BG_23_04_17	1-1.5	74	0.62	1500	Lead, Mercury, PCBs	Grab
14BG_23_04_17	1-1.5	10	1.01	1450	Lead, Mercury, PCBs	Grab

Table1-Summary of Soil Samples
366-394 Wilson Avenue, Newark, NJ

Sample ID	Depth(ft)	PID (ppm)	Mercury Vapor Readings (ug/m3)	Sample Time	analysis	sample method
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Footnotes

EPH: Extractable Petroleum

PPM: Parts per million

TCLP: Toxic Characteristic Leaching Procedure

TCL: Target Compound List

VOCs: Volatile Orgnaic Compounds

RCRA: Resource Conservation and Recovery Act

ug/m3: micrograms per meter cube