

August 10, 2023

Delivered via e-mail: Tames.Pam@epa.gov, dmiller@ghclaw.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 5 (July 31- August 7, 2023)
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.

SITE ACTIVITIES (July 31, 2023 – August 7, 2023)

- On July 31, 2023, ENVOCARE and Salomone Brothers Inc. (SBI) mobilized onsite to conduct soil disposal and post removal sampling of hazardous stockpiles A, B and C.
- On July 31, 2023, soil stockpile A disposal was conducted and completed on August 7, 2023
- On August 1, 2023, soil stockpile B disposal was conducted and completed on August 3, 2023
- On August 3, 2023, soil stockpile C disposal was conducted and completed on August 4, 2023
- All post removal samples were collected on the same day each soil stockpile disposal was completed.

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 (Hg) vapors, volatile organic compounds (VOCs), and particulate matter 10 (PM10) concentrations, and wind direction throughout the day to establish a baseline data. [Figure 1](#) presents the air monitoring locations.

Background monitoring conducted on July 17th, 2023, showed VOCs vapor readings were reported below background of zero (0) parts per million(ppm). Mercury vapor readings were reported below the background of 0.09ug/m³, and PM10 readings were reported below background of 65 ppm. Ambient air was noted to have elevated haze levels present during background air monitoring.

During site soil disposal activities, community air monitoring was conducted from July 31st to August 7th, 2023. VOCs, mercury vapors and PM10 data were continuously monitored at the start of each workday.

No exceedances over the action limits set in the community air monitoring plan were observed during each workday. [Exhibit A](#) presents the air monitoring data.

Based on discussion with the Environmental Protection Agency (EPA), on-scene coordinator (OSC), David Rosoff, during disposal activities for stockpile C, air monitoring station #2 was adjusted to the southwest corner of the main onsite building and air monitoring station #3 was adjusted to the northwest corner of the main onsite building to monitor upwind and downwind data for soil stockpile C. [Figure 1](#) presents the air monitoring location adjustments.

POST REMOVAL SAMPLING

Based on discussion with the EPA OSC, a total of eight (8) post removal sample from stockpile A was collected and analyzed for VOCs, semi-volatile organic compounds (SVOCs), pesticides, polychlorinated biphenyls (PCBs), target analyte list (TAL) metals, extractable petroleum hydrocarbons (EPH), and total cyanide. Eight (8) post removal samples were taken from stockpile B and analyzed for SVOCs, PCBs, TAL metals, and total cyanide. Six (6) post removal samples from stockpile C and analyzed for SVOCs, PCBs, TAL metals, and total cyanide.

DISPOSAL ACTIVITIES

From July 31st to August 7th, 2023, soil disposal for hazardous stockpiles A, B, C was conducted. A total of nineteen (19) truckloads of Toxic Substance Control Act (TSCA) regulated hazardous soil from stockpile A, forty-two (42) truckloads of Resource Conservation and Recovery Act (RCRA) hazardous soil from stockpile B and eleven (11) truckloads of RCRA hazardous soil from stockpile C was transported and disposed of at the Clean Earth of Kearny facility. The final destination of stockpiles A, B, and C was determined to be Chemical Waste Management, Inc located in Emelle, Alabama. For the Non - hazardous stockpile D and E the final destination was determined to be Republic Services Conestoga Landfill located in Morgantown, Pennsylvania. [Exhibit B](#) presents the soil disposal table. Approved Off-Site Rule form (OSR) for final offsite destination of waste is presented as [Exhibit C](#). Disposal manifests will be included in the final report.

PLANNED ACTIVITIES (August 8, 2023 – August 14, 2023)

- Investigation derived waste (IDW) sampling for decontamination activities performed onsite for waste disposal with Clean Earth of Kearny.
- Post drone survey of site after soil stockpile disposal activities

Attachments:

Figure 1 – Air Monitoring Location Map

Exhibit A – Community Air Monitoring data

Exhibit B – Soil Stockpile Disposal table

Exhibit C – Off-Site Rule Form

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

Kind Regards,

Devang Patel
Project Manager

Cc: jlynch@salomone.com
jkelly@salomone.com



Scale in Feet
0 20 40 60
1:500

Legend

- ★ Site Location
- Property Boundary
- Pile Location
- ⬡ Air Monitoring Station

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
Air Monitoring 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

ENVOCARE
ENVIRONMENTAL & FACILITY MANAGEMENT

Exhibit A – Community Air Monitoring data

	Air Monitor 1 (1216)			Air Monitor 2 (1309)			Air Monitor 3: 1647		
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)
7:00			-0.04			4.92			9.8
7:15			-1.3			3.82			5.69
7:30			0.13			5.08			5.23
7:45	0	0	-1.24		0.03	4.32		0	6.14
8:00	0	0.02	-0.5		0	4.98		0	6.07
8:15	0	0.04	-0.73	0	0.05	3.69	0	0	4.9
8:30	0	0.05	-0.66	0	0.01	3.29	0	0	3.9
8:45	0	0.11	-0.2	0	0	3.4	0	0.01	3.55
9:00	0	0.05	0.6	0	0.03	4.09	0	0.01	4.84
9:15	0	0.05	1.11	0	0	4.34	0	0.09	4.53
9:30			-0.09			4.28			3.95
9:45	0	0.05	-0.14	0	0.07	4.2	0	0	4.09
10:00			-0.42			3.76			3.6
10:15	0	0	-1.43	0	0.01	3.44	0	0.01	3.36
10:30	0	0.02	0.76	0	0.06	3.55	0	0	3.95
10:45	0	0.08	4.69	0	0.05	4.36	0	0.02	5.65
11:00	0	0.02	2.85	0	0.08	2.45	0	0.06	2.62
11:15	0	0.04	4.1	0	0.07	2.53	0	0.04	2.7
11:30	0	0.03	3.96	0	0	2.79	0	0	1.96
11:45	0	0.03	2.76	0	0	3.25	0	0.08	3.08
12:00	0	0	3.21	0	0	2.58	0	0	2.2
12:15	0	0	4.05	0	0	4.84	0	0.02	2.82
12:30			3.2			2.98			2.08
12:45			3.44			3.67			2.53
13:00	0	0	5.54	0	0.03	3.12	0	0.05	2.52
13:15			3.71			2.93			2.65
13:30	0	0	3.29	0	0.08	2.87	0	0.04	2.21
13:45			2.82			2.94			2.39
14:00	0	0.03	2.71		0.02	3.17		0.02	2.65
14:15			3.67			2.98			2.1
14:30	0	0.03	3.15		0.04	3.08		0	2.4
14:45			4.87			3.16			2.24
15:00			7.81			3.27			2.88

Exhibit B – Soil Stockpile Disposal table

Soil Stockpiles A, B and C Waste Disposal Summary
366-394 Wilson Avenue, Newark, New Jersey

Date	Stockpile Designation	Load Number	Waste Material	Disposed Off-Site (Tonnage)	Off-Site Disposal Facility for Waste	Final Off-Site Destination for Waste
Soil Stockpile A						
7/31/23	A	1	TSCA, High total mercury	22*	Clean Earth of North Jersey, Inc. (CENJ), Kearny, NJ	Chemical Waste Management, Inc. Emelle, AL
7/31/23	A	2	TSCA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
7/31/23	A	3	TSCA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
7/31/23	A	4	TSCA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
7/31/23	A	5	TSCA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
7/31/23	A	6	TSCA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
7/31/23	A	7	TSCA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
7/31/23	A	8	TSCA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
7/31/23	A	9	TSCA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
7/31/23	A	10	TSCA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/7/23	A	11	TSCA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/7/23	A	12	TSCA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/7/23	A	13	TSCA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/7/23	A	14	TSCA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/7/23	A	15	TSCA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/7/23	A	16	TSCA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/7/23	A	17	TSCA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.

*=Soil disposal is estimated and will be updated upon receipt of final weight tickets from CENJ

8/7/23	A	18	TSCA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/7/23	A	19	TSCA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
Soil Stockpile B						
8/1/23	B	1	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/1/23	B	2	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/1/23	B	3	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/1/23	B	4	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/1/23	B	5	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/1/23	B	6	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/1/23	B	7	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/1/23	B	8	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/1/23	B	9	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/1/23	B	10	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/1/23	B	11	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/1/23	B	12	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/1/23	B	13	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/1/23	B	14	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/1/23	B	15	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/1/23	B	16	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/1/23	B	17	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/1/23	B	18	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.

*=Soil disposal is estimated and will be updated upon receipt of final weight tickets from CENJ

8/2/23	B	19	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/2/23	B	20	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/2/23	B	21	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/2/23	B	22	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/2/23	B	23	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/2/23	B	24	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/2/23	B	25	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/2/23	B	26	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/2/23	B	27	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/2/23	B	28	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/2/23	B	29	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/2/23	B	30	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/2/23	B	31	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/2/23	B	32	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/2/23	B	33	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/2/23	B	34	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/2/23	B	35	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/2/23	B	36	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/3/23	B	37	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/3/23	B	38	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/3/23	B	39	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.

*=Soil disposal is estimated and will be updated upon receipt of final weight tickets from CENJ

8/3/23	B	40	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/3/23	B	41	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/3/23	B	42	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
Soil Stockpile C						
8/3/23	C	1	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/3/23	C	2	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/3/23	C	3	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/3/23	C	4	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/3/23	C	5	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/3/23	C	6	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/4/23	C	7	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/4/23	C	8	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/4/23	C	9	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/4/23	C	10	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.
8/4/23	C	11	RCRA, High total mercury	22*	CENJ	Chemical Waste Management, Inc.

*=Soil disposal is estimated and will be updated upon receipt of final weight tickets from CENJ

Soil Stockpiles D and E Waste Disposal Summary
366-394 Wilson Ave, Newark, New Jersey

Date:	Stockpile Designation	Load Number	Waste Material	Disposed Off-Site (Tonnage)	Off-Site Disposal Facility for Waste	Final Off-Site Destination for Waste
Soil Stockpile D						
7/18/23	D	1	Soil (Non-Hazardous)	19.39	Clean Earth of North Jersey, Inc. (CENJ), Kearny, NJ	Republic Services Conestoga Landfill Morgantown, PA
7/18/23	D	2	Soil (Non-Hazardous)	25.87	CENJ	Republic Services Conestoga Landfill
7/18/23	D	3	Soil (Non-Hazardous)	18.71	CENJ	Republic Services Conestoga Landfill
7/18/23	D	4	Soil (Non-Hazardous)	25.83	CENJ	Republic Services Conestoga Landfill
7/18/23	D	5	Soil (Non-Hazardous)	30.82	CENJ	Republic Services Conestoga Landfill
7/18/23	D	6	Soil (Non-Hazardous)	29.48	CENJ	Republic Services Conestoga Landfill
7/18/23	D	7	Soil (Non-Hazardous)	30.78	CENJ	Republic Services Conestoga Landfill
7/18/23	D and E (1/2 load from D and 1/2 load from E)	8	Soil (Non-Hazardous)	30.83	CENJ	Republic Services Conestoga Landfill
Soil Stockpile E						
7/18/23	E	9	Soil (Non-Hazardous)	25.76	CENJ	Republic Services Conestoga Landfill
7/18/23	E	10	Soil (Non-Hazardous)	32.84	CENJ	Republic Services Conestoga Landfill
7/20/23	E	11	Soil (Non-Hazardous)	16.72	CENJ	Republic Services Conestoga Landfill
7/20/23	E	12	Soil (Non-Hazardous)	21.47	CENJ	Republic Services Conestoga Landfill
7/20/23	E	13	Soil (Non-Hazardous)	21.57	CENJ	Republic Services Conestoga Landfill
7/21/23	E	14	Timber/Tree Stumps/Brush	3.59	CENJ	Republic Services Conestoga Landfill
7/21/23	E	15	Soil (Non-Hazardous)	20.14	CENJ	Republic Services Conestoga Landfill
7/21/23	E	16	Concrete	11.06	CENJ	Republic Services Conestoga Landfill
7/21/23	E	17	Soil (Non-Hazardous)	20.39	CENJ	Republic Services Conestoga Landfill
7/21/23	E	18	Soil (Non-Hazardous)	18.6	CENJ	Republic Services Conestoga Landfill
7/21/23	E	19	Timber/Tree Stumps/Brush	5.86	CENJ	Republic Services Conestoga Landfill

Exhibit C – Off-Site Rule Form

U.S. EPA Region 2 Off-Site Rule Request Form

[Reset Form](#)

Receiving Facility Information

Estimated Initial Shipping Date: **07/31/2023**
Estimated Shipping Completion Date: **08/25/2023**

Supporting Documentation Attached: ☐ Yes ☒ No

1.) Name of Facility Receiving CERCLA Waste
Chemical Waste Management, Inc.

2.) Address of Facility

36964 Alabama Highway 17 North

3.) City
Emelle

4.) County
Sumter

5.) State
Alabama

6.) Zip Code
35459

7.) EPA Facility I.D. (Hazardous Waste or Municipal Waste I.D.)
ALD 000622464

[RCRA Info Webpage](#)

Facility Type

Subtitle C ☒

Subtitle D ☒

Other ☐

State Permit No.

NPDES: AL0050580

8.) Any other pertinent I.D. numbers that may apply (License Numbers, etc.)

Synthetic Minor Source Operating Permit: 412-X001-X003, X005-X010

9.) Facility Phone Number
+1 (205) 609-0634

Contact Name
Melissa Acker

10.) Facility Fax Number (if available)
+1 (866) 820-6302

11.) Email Address
macker@wm.com

Generating Site Information

12.) Name of CERCLA Site
Oberwil Portion of Pierson's Creek Superfund Site OU1 - EPA I.D. NJN986663052

13.) Address of CERCLA Site
366-394 Wilson Avenue (Block 5038, Lot 97) also listed as 7 Avenue L

14.) City
Newark

15.) County
Essex

16.) State
New Jersey

17.) Zip Code
07105

18.) CERCLA Site I.D.
02MV

19.) CERCLA Waste Median (e.g. Soil, Water, Air etc.)
Soil

Hazardous and/or Non-Hazardous (check all that apply)
RCRA Hazardous ☒ Non-Hazardous ☐

20.) CERCLA Waste Contaminates (e.g. tce, pcb, Mercury, Lead, etc.)
Mercury, Lead, PCBs

21.) Amount of CERCLA Waste (e.g. Gallons, Pounds, Tons, etc.)
1,552 Tons

22.) Person Making Request(s)/Affiliation & Phone Number
John Lynch, Salomone Bros., Inc. (973) 305-0022

Submit via Desktop email

(Lotus Notes Users Select Submit via Desktop email Application)

U.S. EPA Region 2 Off-Site Rule Request Form

[Reset Form](#)

Receiving Facility Information

Estimated Initial Shipping Date: **07/31/2023**
 Estimated Shipping Completion Date: **08/25/2023**

Supporting Documentation Attached: ☐ Yes ☒ No

1.) Name of Facility Receiving CERCLA Waste
Republic Services Conestoga Landfill

2.) Address of Facility
420 Quarry Road

3.) City **Morgantown** 4.) County **Berks**

5.) State **Pennsylvania** 6.) Zip Code **19543**

7.) EPA Facility I.D. (Hazardous Waste or Municipal Waste I.D.)
PA0000015867 [RCRA Info Webpage](#)

Facility Type
 Subtitle C ☐ Subtitle D ☒ Other ☐

State Permit No.
PADEP #101509

8.) Any other pertinent I.D. numbers that may apply (License Numbers, etc.)
APS # 922475

9.) Facility Phone Number **+1 (610) 286-6844** Contact Name **Bryan Cleaver**

10.) Facility Fax Number (if available) **+1 (866) 820-6302** 11.) Email Address **bcleaver@republicservices.com**

Generating Site Information

12.) Name of CERCLA Site
Oberwil Portion of Pierson's Creek Superfund Site OU1 - EPA I.D. NJN986663052

13.) Address of CERCLA Site
366-394 Wilson Avenue (Block 5038, Lot 97) also listed as 7 Avenue L

14.) City **Newark** 15.) County **Essex**

16.) State **New Jersey** 17.) Zip Code **07105**

18.) CERCLA Site I.D.
02MV

19.) CERCLA Waste Median (e.g. Soil, Water, Air etc.)
Soil

Hazardous and/or Non-Hazardous (check all that apply)
 RCRA Hazardous ☐ Non-Hazardous ☒

20.) CERCLA Waste Contaminates (e.g. tce, pcb, Mercury, Lead, etc.)
PCBs, Mercury, Lead

21.) Amount of CERCLA Waste (e.g. Gallons, Pounds, Tons, etc.)
Stockpile D and E: 390 Tons

22.) Person Making Request(s)/Affiliation & Phone Number
John Lynch, Salomone Bros., Inc. (973) 305-0022

Submit via Desktop email

(Lotus Notes Users Select Submit via Desktop email Application)