New Jersey Department of Environmental Protection
Site Remediation and Waste Management Program

REMEDIAL TIMEFRAME NOTIFICATION FORM

☒ Extension Request
☐ Lengthen Remedial Investigation Report (RIR) Timeframe Notification
☐ Contaminated Media Notification

Date Stamp
(For Department use only)

SECTION A. SITE NAME AND LOCATION

Site Name: Ewing Township Industrial Land

List all AKAs: Former Delphi Lighting & Systems Division, GM Trenton, Turnstead Division of GM, Fischer Body Division

Street Address: 1445 Parkway Avenue

Municipality: Ewing Township (Township, Borough or City)

County: Mercer Zip Code: 08628

Program Interest (PI) Number(s): 011336

Case Tracking Number(s) for this submission: E97070; LSR110001

SECTION B. NJDEP CASE MANAGER

Do you have an assigned Case Manager? ..... ☐ Yes ☒ No

If "Yes," please list the Case Manager: _____

SECTION C. EXTENSION REQUEST

(Complete this section only if you are filing an extension request)

An extension is requested to the regulatory timeframe pursuant to NJAC 7:26C-3.2(b) or the mandatory or site-specific timeframe pursuant to NJAC 7:26C-3.5 as follows:

Report Type	Current Regulatory Timeframe	Proposed Regulatory Timeframe**	Current Mandatory or Expedited Site-Specific Timeframe	Proposed Mandatory or Expedited Site Specific Timeframe
Initial Receptor Evaluation*				
Preliminary Assessment Report*				
Site Investigation Report*				
Remedial Investigation Report*				
Remedial Action Report*	05/06/2022	05/06/2024		
LNAPL Interim Remedial Measures Report*				
Immediate Environmental Concern Engineered System Response Action Report				
Immediate Environmental Concern Source Control Report*				
Other (write in):				
Other (write in):				
Other (write in):				

* This report has a mandatory remediation timeframe
** This date cannot exceed the mandatory remediation timeframe.

Note: Extensions to the regulatory timeframe are deemed approved provided the requirements of N.J.A.C. 7:26C-3.2(b) are met. If these requirements are not met, the NJDEP will notify the requestor in writing the extension is denied.

Justification for Extension

1. Describe the cause or causes of the need for additional time to complete the work:

To date, extensive investigation and remediation efforts have been completed at the Site by RACER as described in the attached document. Additional time is required to allow for the collection of groundwater data that supports the effectiveness of the remedial efforts for groundwater at the Site.

2. Describe in detail the steps taken to minimize the additional time needed to complete the work:

(For any site where access is a cause of the need for additional time to complete the work, detail the steps taken to obtain access)

Extensive remediation has been completed targeting elevation groundwater concentrations at the Site over the last three years. The current results support the effectiveness of the remediation; however, additional time is necessary to support the remedial effort.

3. Additional information:

Attached graphs provide groundwater data for the Site demonstrating completed monitoring events. Figure 1 provides a Site Plan.

SECTION D. CONTAMINATED MEDIA NOTIFICATION (to Adjust RI/RA Regulatory Timeframes)

(Complete this section only when notifying the NJDEP of the discovery of contamination in any media other than soil.)

Contamination was discovered in:

- ☐ Ground Water Date: _____
- ☐ Sediment Date: _____
- ☐ Surface Water Date: _____

For sites not subject to N.J.S.A. 58:10C-27 wherein the remedial investigation must be completed by May 7, 2014, checking any box will increase the regulatory timeframe to complete the remedial investigation and remedial action from 3 years to 5 years and requires the Annual Remediation Fee Form be updated via the NJ Portal pursuant to N.J.A.C 7:26C-4.3(e).

SECTION E. LENGTHEN RIR TIMEFRAME NOTIFICATION

(Complete this section only if you are lengthening the Remedial Investigation Report Regulatory Timeframe)

1. Is the request for an Industrial Establishment subject to ISRA? ..... ☐ Yes ☐ No
2. Indicate the number of additional years requested beyond the initial Remedial Investigation Report Regulatory Timeframe due date. Number of Years: _____ (Maximum of 4 years)
3. The initial Remedial Investigation Report Regulatory Timeframe Due Date: ..... _____
4. The revised Remedial Investigation Report Regulatory Timeframe Due Date: ..... _____
5. Justification (check all that apply)
   - ☐ Access to real property not owned or controlled by the person responsible for conducting the remediation is required, or contamination has impacted an environmentally sensitive natural resource, as defined in N.J.A.C. 7:26E-1.8.
   - ☐ Ground water contamination exists in a consolidated aquifer or a dense non-aqueous phase liquid exists in ground water.
   - ☐ Ground water contamination exists in more than one aquifer or there are two or more distinct ground water contaminant plumes.
   - ☐ The person responsible for conducting the remediation wants a final remediation document for the entire site, the discharge was not discovered prior to May 7, 1999, and the site does not include an industrial establishment that the owner or operator are required to remediate pursuant to the Industrial Site Recovery Act, N.J.S.A. 13:1K-6 et seq., and the Industrial Site Recovery Act rules, N.J.A.C. 7:26B.

SECTION F. LICENSED SITE REMEDIATION PROFESSIONAL INFORMATION AND STATEMENT

LSRP ID Number: 586486

First Name: Amy Last Name: Murphy

Phone Numbers: (973) 263-3900 Ext.: Fax:

Mailing Address: 299 Cherry Hill Road, Suite 303

Municipality: Parsippany State: New Jersey Zip Code: 07054

Email Address: AMurphy@HaleyAldrich.com

This statement shall be signed by the LSRP who is submitting this notification in accordance with N.J.S.A. 58:10C-14, and N.J.S.A. 58:10B-1.3b(1) and (2).

(1) I certify, as a Licensed Site Remediation Professional authorized pursuant to N.J.S.A. 58:10C-1 et seq. to conduct business in New Jersey, that for the remediation described in this submission, and all attachments included in this submission, I personally: Managed, supervised, or performed the remediation conducted at this site that is described in this submission, and all attachments included in this submission; and/or periodically reviewed and evaluated the work performed by other persons that forms the basis for the information in this submission; and/or completed the work of another site remediation professional, licensed or not, after having: (1) reviewed all available documentation on which I relied; (2) conducted a site visit and observed the then-current conditions and verified the status of as much of the work as was reasonably observable; and (3)concluded, in the exercise of my independent professional judgment, that there was sufficient information upon which to complete any additional phase of remediation and prepare workplans and reports related thereto.

(2) I certify:

- *That I have read this submission and all attachments to this submission;*
- *That in performing the professional services as the licensed site remediation professional for the entire site or each area of concern, I adhered to the professional conduct standards and requirements governing licensed site remediation professionals provided in N.J.S.A. 58:10C-16;*
- *That the remediation conducted at the entire site or each area of concern, that is described in this submission and all attachments to this submission, was conducted pursuant to and in compliance with the remediation requirements in N.J.S.A. 58:10C-14.c;*
- *That the remediation described in this submission, and all attachments to this submission, was conducted pursuant to and in compliance with the regulations of the Site Remediation Professional Licensing Board at N.J.A.C. 7:26I; and*
- *That the information contained in this submission and all attachments to this submission is true, accurate, and complete.*

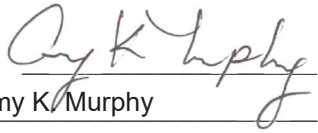
(3) I certify, when this submission includes a response action outcome, that the entire site or each area of concern has been remediated in compliance with all applicable statutes, rules, and regulations and is protective of public health and safety and the environment.

(4) I certify that no other person is authorized or able to use any password, encryption method, or electronic signature that the Board or the Department have provided to me.

(5) I certify that I understand and acknowledge that:

- *If I knowingly make a false statement, representation, or certification in any document or information I submit to the Department I may be subject to civil and administrative enforcement pursuant to N.J.S.A. 58:10C-17.a.1(a)through (f) by the Board, including but not limited to license suspension, revocation, or denial of renewal; and*
- *If I purposely, knowingly, or recklessly make a false statement, representation, or certification in any application, form, record, document or other information submitted to the Department or required to be maintained pursuant to the Site Remediation Reform Act, I shall be guilty, upon conviction, of a crime of the third degree and shall, notwithstanding the provisions of subsection b. of N.J.S.2C:43-3, be subject to a fine of not less than $5,000 nor more than $75,000 per day of violation, or by imprisonment, or both.*

(6) I certify that I have read this certification prior to signing, certifying, and making this submission.

LSRP Signature:  Date: 3/23/2022

LSRP Name: Amy K. Murphy

Company Name: Haley & Aldrich Inc.

SECTION G. PERSON RESPONSIBLE FOR CONDUCTING THE REMEDIATION INFORMATION AND CERTIFICATION

Full Legal Name of the Person Responsible for Conducting the Remediation: RACER Trust*

Representative First Name: Robert Representative Last Name: Hare

Title: Cleanup Manager (IL, IN, KS, MO, NJ, WI)

Phone Number: (313) 486-2908 Ext.: FAX: (734) 879-9537

Mailing Address: 1505 Woodward Avenue, Suite 200

Municipality: Detroit State: Michigan Zip code: 48226

Email Address: rhare@racertrust.org

This certification shall be signed by the person responsible for conducting the remediation who is submitting this notification in accordance with Administrative Requirements for the Remediation of Contaminated Sites rule at N.J.A.C. 7:26C-1.5(a).

I certify under penalty of law that I have personally examined and am familiar with the information submitted herein, including all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, to the best of my knowledge, I believe that the submitted information is true, accurate and complete. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of any statute, I am personally liable for the penalties.

Signature: Date: 3-23-2022

Name/Title: Robert W. Hare/Cleanup Manager (IL, IN, KS, MO, NJ, WI)

Company Name: RACER Trust

Completed forms should be sent to:

Bureau of Case Assignment & Initial Notice
Site Remediation Program
NJ Department of Environmental Protection
401-05H
PO Box 420
Trenton, NJ 08625-0420

* Full Legal Name of Person Responsible: REVITALIZATION AUTO COMMUNITIES ENVIRONMENTAL RESPONSE TRUST, a trust formed under the laws of the State of New York, by EPLET, LLC,Administration Trustee Elliot P. Laws, Managing Member

HALEY & ALDRICH, INC.
299 Cherry Hill Rd.
Suite 303
Parsippany, NJ 07054
973.263.3900

23 March 2022
File No. 70613-866

New Jersey Department of Environmental Protection
Bureau of Case Assignment & Initial Notice
Site Remediation Program
PO BOX 420
Trenton, New Jersey 08625-0420

Subject: Supporting Addendum for Remedial Timeframe Notification Form
Ewing Township Industrial Land
1445 Parkway Avenue
Ewing Township, New Jersey
NJDEP SRP PI No. 011336
ISRA Case No. E97070

1. Describe the cause or causes of the need for additional time to complete the work:

Extensive investigation and remediation of the Site has been conducted since the inception of the project in 1987 by both General Motors Corporation and Revitalizing Auto Communities Environmental Response (RACER) Trust. A remediation settlement agreement for the environmental liabilities was negotiated between Motors Liquidation Company and the State of New Jersey as part of bankruptcy proceedings of General Motors Corporation in 2009. The settlement agreement established a number of remaining remediation activities required to address Site-related contamination. As part of the remedial work, RACER Trust which was established as part of the bankruptcy to address environmental liabilities, has completed all of the stipulated remediation activities identified in the settlement agreement. RACER Trust, under the direction of the New Jersey Department of Environmental Protection (NJDEP), continues to address remnant overburden bedrock groundwater impacts. The Site remediation activities completed to date include:

SOILS AND SEDIMENT

A Soils-Only Restricted Use Areas of Concern Response Action Outcome (RAO) was issued on 21 June 2018 documenting that remediation of soils was completed in compliance with NJDEP regulations and guidance, and institutional and engineering controls were protective of public health, safety, and the environment. A detailed synopsis of the remedial actions completed was presented in the October 2016 Soil Remedial Action Report (RAR) and the June 2018 Revised Soil RAR Addendum. A brief summary of remedial actions, which includes over 18,000 tons of soil and sediment removed from the Site, is as follows:

- **AOC-01A – 1,000-Gallon Leaded Gasoline UST Removal.** In April 2008, the underground storage tank (UST) system (E006) was closed as part of on-going Site remediation activities.

Approximately 119 tons of soil were excavated and disposed of from both this excavation and the 10,000-gallon UST.

- **AOC-01C – 10,000-Gallon UST Removal.** In April 2008, the UST system (E005) was closed as part of on-going Site remediation activities. Approximately 119 tons of soil were excavated and disposed of from both this excavation and the 1,000-gallon UST removal. Additionally, approximately 2,467-gallons of water was removed from the tank for disposal.
- **AOC-01C – Plater Pits #5 and #6 Excavations.** Soil excavation activities were conducted between 24 September 2013 and 7 October 2013. Approximately 130 cubic yards (cy) of material was removed from Plater Pit #5. Approximately 644 cy of material were removed from Plater Pit #6. A total of 767 tons of soil was disposed of between 27 September 2013 and 4 October 2013.
- **AOC-01D – LNAPL Remedial Measures.** A measurable amount (0.13 feet) of light non-aqueous phase liquid (LNAPL) was observed on 3 August 2012 in recovery well RW-101 in AOC-01D. LNAPL levels were monitored in recovery wells RW-100 through RW-102 and if measurable amounts of LNAPL were detected (>0.01 ft), absorbent socks were placed within wells for recovery and disposal. Monitoring began on 31 August 2012 and continued through 24 April 2014. No measurable LNAPL had been observed in the wells since October 2013. Additionally, test pits were dug to delineate the residual LNAPL in October 2013. The area was determined to be no longer an issue and all recoverable LNAPL was captured using absorbent socks and booms placed in recovery wells and test pits, respectively.
- **AOC-02 – PCB Transformer Spill Excavations.** A polychlorinated biphenyl (PCB) release occurred in the vicinity of the former transformer M-1 near the former Primary Switch House. In June 2004 and May 2005 soil excavations were conducted to remove PCB impacted soil. Several soil boring events were conducted to delineate the extent of soil impacts prior to excavation. In 2004 and 2005, approximately 332 tons of PCB-impacted soils were excavated and disposed off-site.
- **AOC-03 – Historic Gasoline UST Removals.** Two gasoline USTs and associated fuel pumps located within AOC-03 were removed in 1987 and 1989. One UST (E007) was 4,000-gallons and the second UST (E001) was 2,000-gallons. As reported, the UST was observed to be structurally sound with no evidence of release. For these historical UST removals, specific details on excavation amount, soil disposal location and fill information are not known. However, the nature and extent of soil contamination in this area has been delineated and addressed in the Soil RAR.
- **AOC-08A – Historic Oil/Water Separator and Waste Oil UST Removal.** Demolition and removal of the old oil/water separator and 30,000- gallon waste oil UST (E002) and backfilling of the excavation was conducted between November 1996 and early January 1997. Approximately 62 drums of sludge material and 176 tons of soil were removed during demolition and transported off-site.
- **AOC-09 – Parking Lot Equipment Storage Area PCB Excavations.** PCB-impacted soil encountered in this area is most likely associated with fill material placed in the 1950s during parking lot construction and therefore the remediation was not subject to Toxic Substances Control Act (TSCA) regulations. Two excavations were conducted in the area in September/October 2013, the northern excavation (333 cubic yards) and the southern excavation (415 cubic yards). A viscous, orange-colored substance that had a strong volatile

organic compound (VOC), possibly paint-like odor was observed seeping from the western wall of the southern excavation. Approximately 108 tons of soil classified as hazardous (due to potential VOCs in soil) was transported under manifest as TSCA waste in accordance with the disposal facility requirements due to contaminant concentrations. Approximately 713 tons of soil classified as non-hazardous were excavated from both of these areas and disposed of-site.

- **AOC-11 – Former Gold Run Pond Excavation.** Trichloroethene (TCE) was detected in sediments (at depths from 2-3 ft) at concentrations up to 130 mg/kg of the former Gold Run Pond. Elevated concentrations of TCE in surface water were also identified at the outfall of the Parkway Avenue storm water sewer which conveys surface water run-off from the nearby Naval Air Warfare Center (NAWC), residential areas, and Gold Run headwaters. During the period of September to November 2011, approximately 11,250 tons of soils/sediments were removed and disposed off-site and the former pond was reconfigured into wetlands.
- **AOC-11 – Historic Buried Drum Removal.** A geophysical survey of the suspected drum burial area was performed in 1994. A total of 190 drums were removed and disposed off-site from this area. Approximately 171 tons of soil below and around the drums, the drums, and sawdust were removed from Memorandum of Agreement (MOA) Area A and transported off-site in roll-off boxes. During excavations approximately 20,000-gallons of water was pumped from the excavation and disposed of off-site.
- **AOC-12 – Southern Drainage Swale Excavation.** In September 2011, excavation activities were conducted along the southern swale and approximately 4,388 tons of soil was disposed of offsite from this excavation activity.
- **Impact To Groundwater Soil Remediation.** Between February and March 2018, approximately 4,881 tons of soil were excavated and disposed of to address the potential Impact to Groundwater (IGW) pathway at the Site. The excavations targeted 31 locations that were identified as exceeding the IGW Site-Specific Soil Remediation Standards developed for the Site.

GROUNDWATER

Following submittal of the Groundwater Remedial Investigation Report (Haley & Aldrich, 2016) and following extensive soil remediation efforts, the NJDEP expressed concerns that concentrations of TCE in several monitoring wells in the AOC-01C area exceeded one percent of solubility, indicating the potential presence of a residual contaminant source. A significant soil VOC source was not identified despite extensive soil investigation efforts. In addition, elevated levels of hexavalent chromium were identified to be present in groundwater within AOC-01C, specifically highest at monitoring well MW-88. Consequently, targeted Enhanced Reductive Dechlorination (ERD) groundwater remediation was conducted in AOC-A1, including the following:

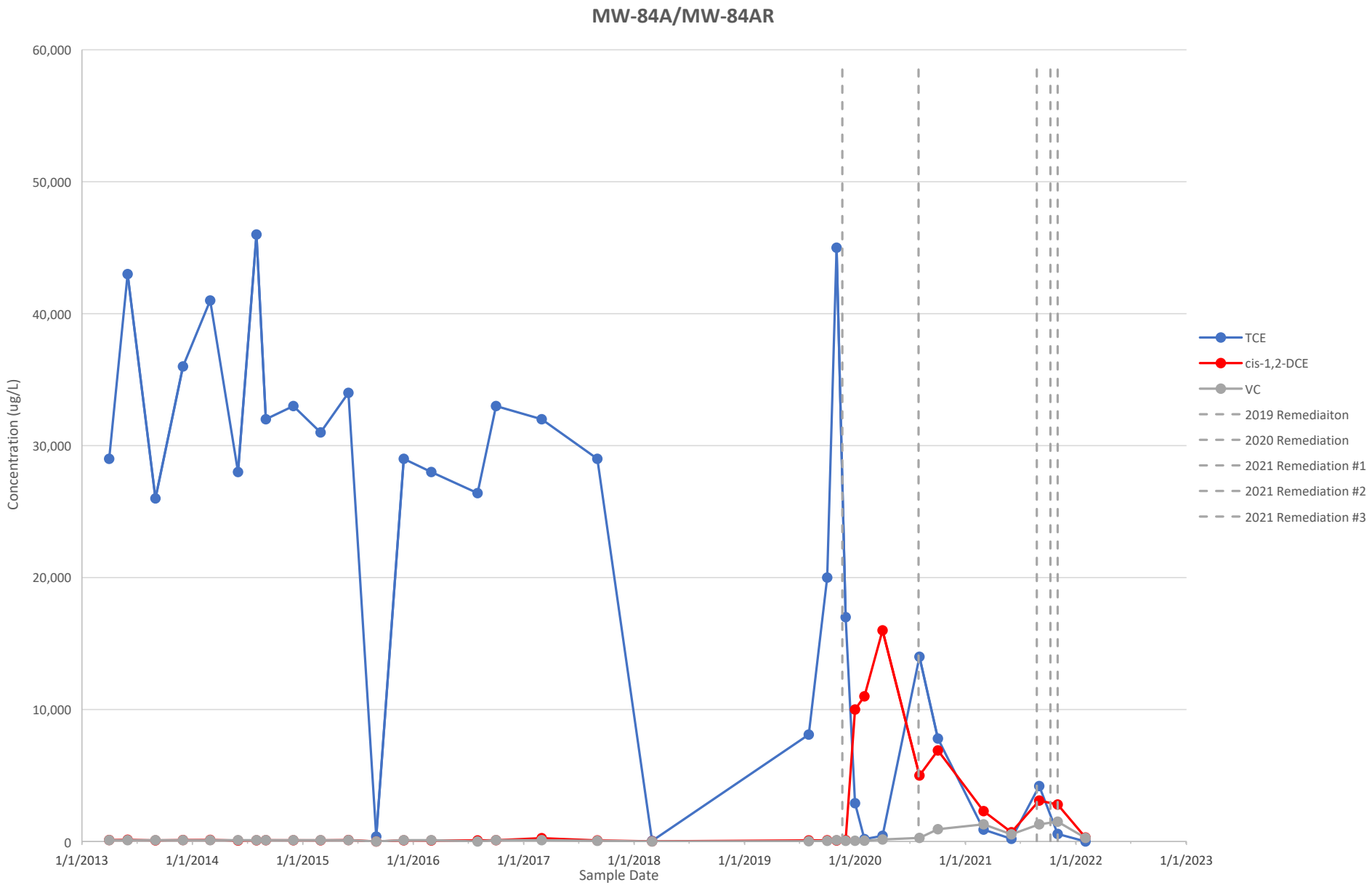
- **2019 Groundwater ERD Pilot Study.** To address elevated groundwater concentrations within the vicinity of MW-84, MW-84A, and MW-85, a pilot study was conducted between 5 October 2019 and 16 November 2019. Approximately 22,000 pounds of carbon substrate (Provect-ERD™) and 10 liters of bioaugmentation culture were injected into the subsurface and approximately 39,905 gallons of groundwater were recirculated. This work was completed under the Discharge to Groundwater (DGW) Permit-By-Rule (PBR) approved on 26 September 2019, which has a duration of 180 days (LSR110001).

- **2020 Groundwater ERD Pilot Study Extension.** In May 2020, RACER received an extension to the PBR to conduct an additional event at the Site as the PBR time period was affected by the 2020 COVID-19 shutdowns. Additional recirculation and substrate addition was conducted in July 2020. An additional 28,000 pounds of substrate (Provect-ERD-CH4™) and 30 liters of bioaugmentation culture were injected into the subsurface and approximately 44,500 gallons of groundwater were recirculated. This work was completed under the pilot test PBR approved on 26 September 2019 (LSR110001).
- **2021 Groundwater ERD Treatment.** To expand the treatment area to include elevated TCE and metals (chromium and nickel) in the vicinity of MW-86, MW-87, and MW-88, additional remediation was completed. Between July and November 2021, approximately 62,200 pounds of carbon substrate (Wilclear Plus) and 19 liters of bioaugmentation culture were injected into the subsurface and approximately 300,000 gallons of groundwater were recirculated. This work was completed under the PBR approved on 8 July 2021 (DGWD0000151595), which has a five-year duration.

Currently, within the targeted treatment area, groundwater concentrations have been reduced by as much as four orders of magnitude for TCE. Daughter products are also decreasing and in some locations are below detection. Final reductive processes have been observed as indicated by the production of ethene. Though the remediation has been a success to date, additional time is necessary to monitor the remedial action for potential rebound and assess down-gradient concentrations. As a result, additional groundwater sampling is scheduled to be completed over the next two years (2022 and 2023) to demonstrate the effectiveness of the remedial measures and to gather sufficient data to develop supporting data to submit a monitored natural attenuation Groundwater Remedial Action Permit (GW-RAP) Application, prepare and submit the comprehensive Remedial Action Report, and issue the RAO by the Licensed Site Remediation Profession (LSRP) following NJDEP's review and approval of the GW-RAP Application.

2. Describe in detail the steps taken to minimize the additional time needed to complete the work:

To reduce the time necessary to complete the remaining groundwater remediation work, groundwater sampling activities have been on-going throughout groundwater remediation activities to monitor and adjust remedial efforts. These sampling events are currently scheduled on a quarterly basis to minimize the time necessary to collect the data that supports the remediation success and continued effectiveness. Should groundwater concentrations rebound in the target treatment area in the current groundwater quality trends, plans are ready to augment the remediation with additional in-situ stimulations, implemented under the current five-year PBR. The effectiveness of the remedial efforts will be monitored over the next two years to provide the information necessary to prepare the RAR and monitored natural attenuation GW-RAP Application.



NOTES:

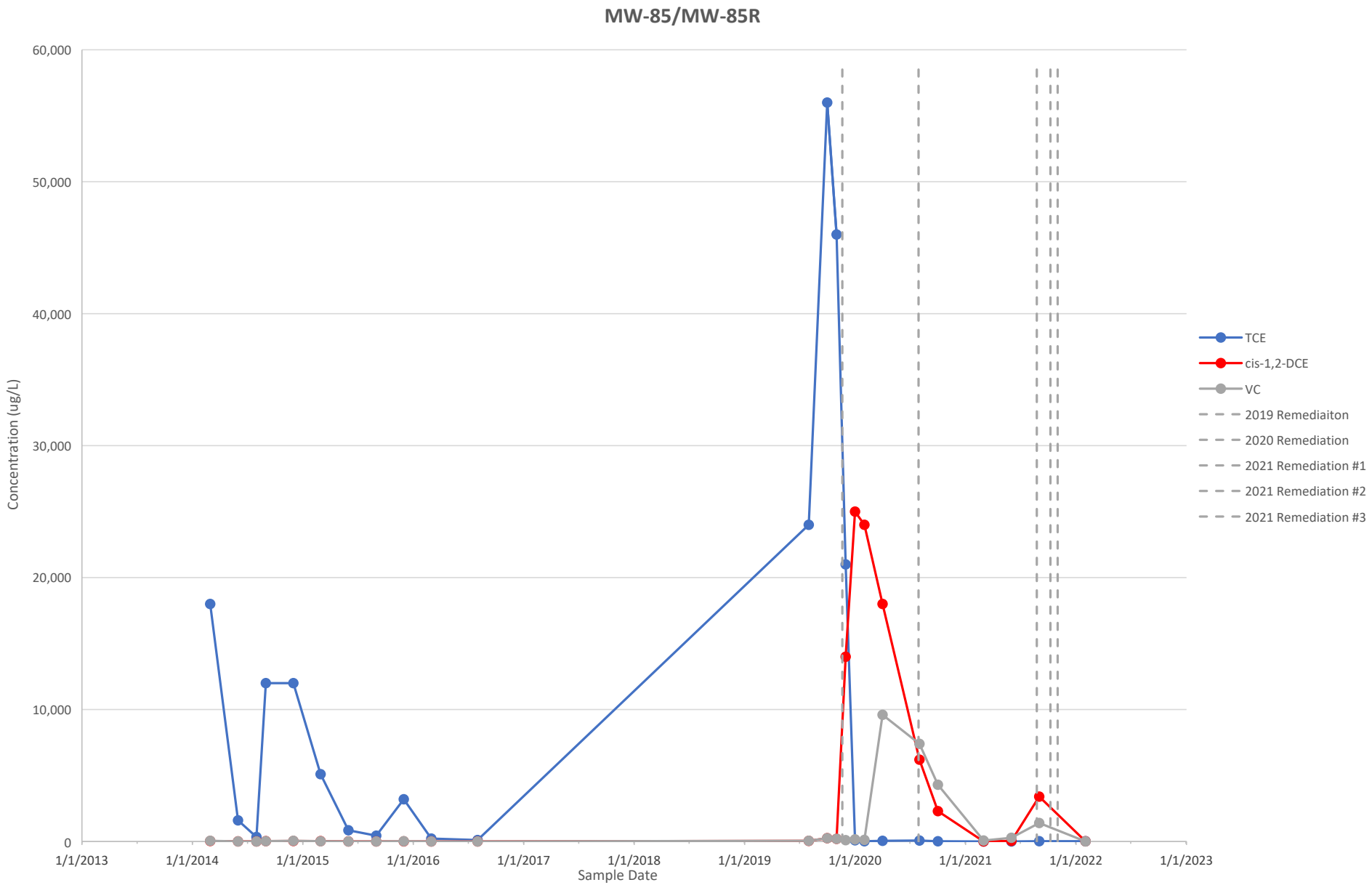
1. Reporting used when concentration was not detected.
2. cis-1,2-DCE = cis-1,2-Dichloroethene
   TCE = Trichloroethene
   VC = Vinyl Chloride
3. Groundwater data from August 2019 from replacement well MW-84AR.

HALEY ALDRICH

EWING TOWNSHIP INDUSTRIAL LAND
ISA CASE NO. E97070
EWING TOWNSHIP, NEW JERSEY

CONCENTRATION TREND

March 2022



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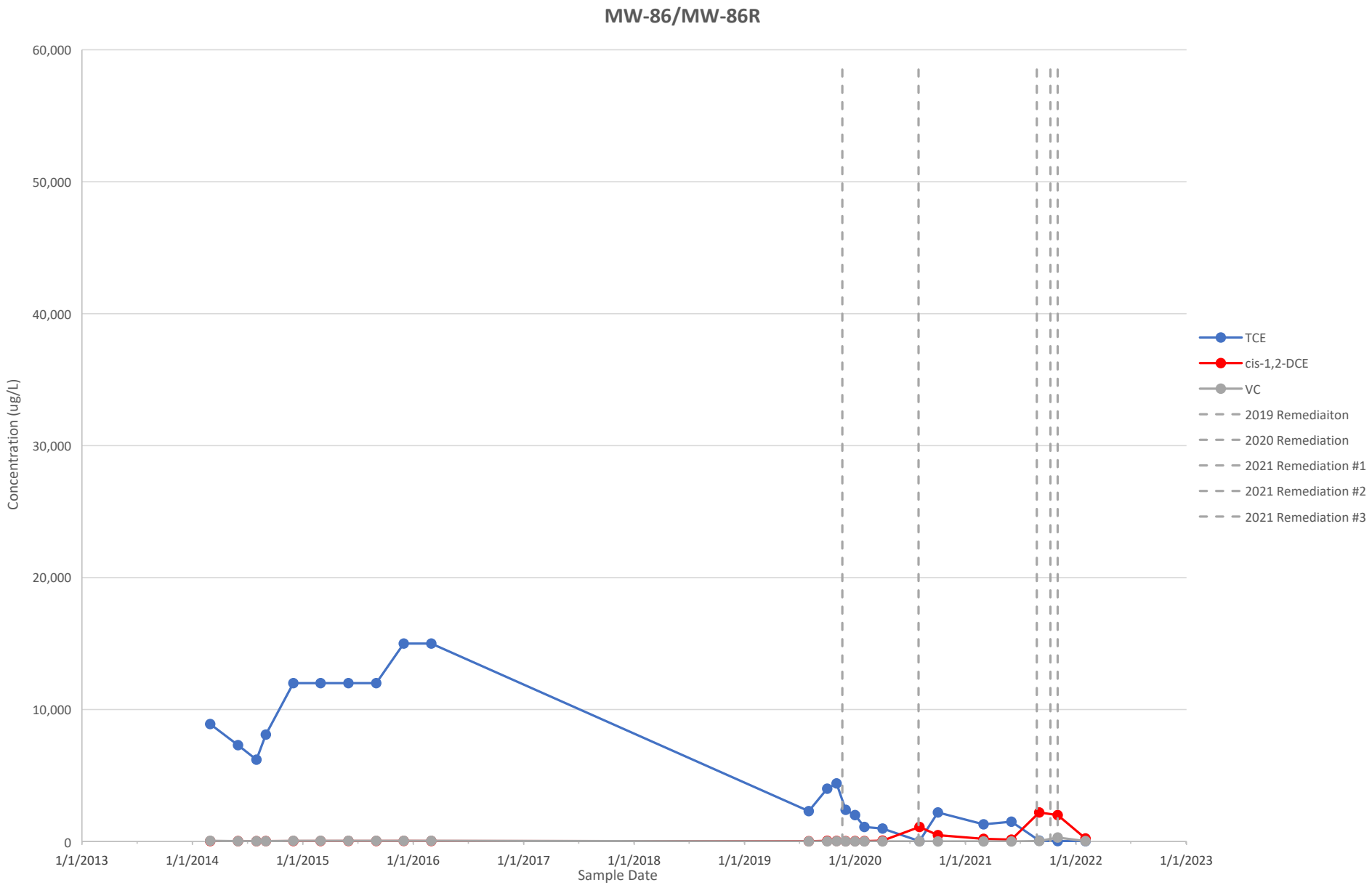

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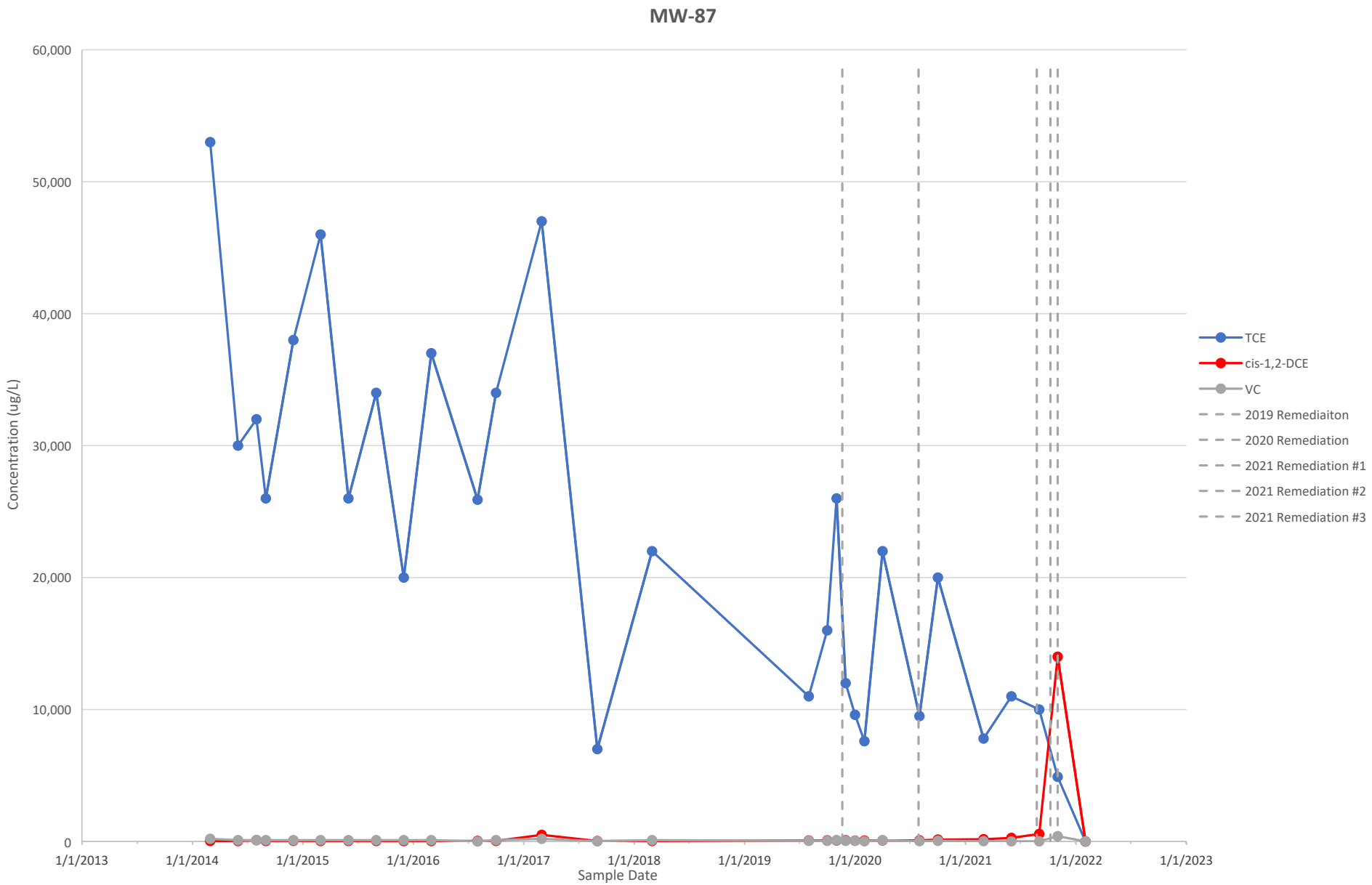

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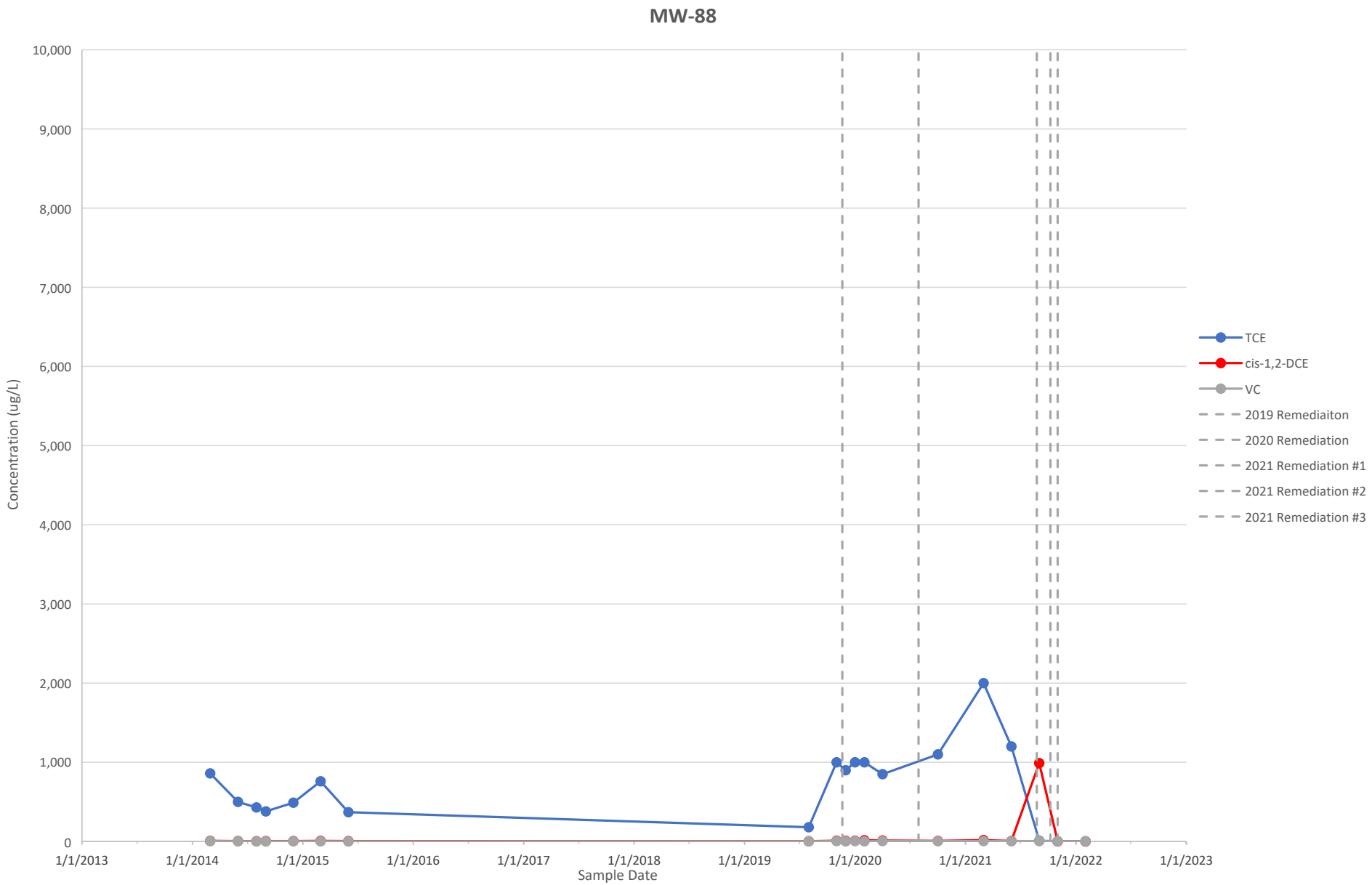

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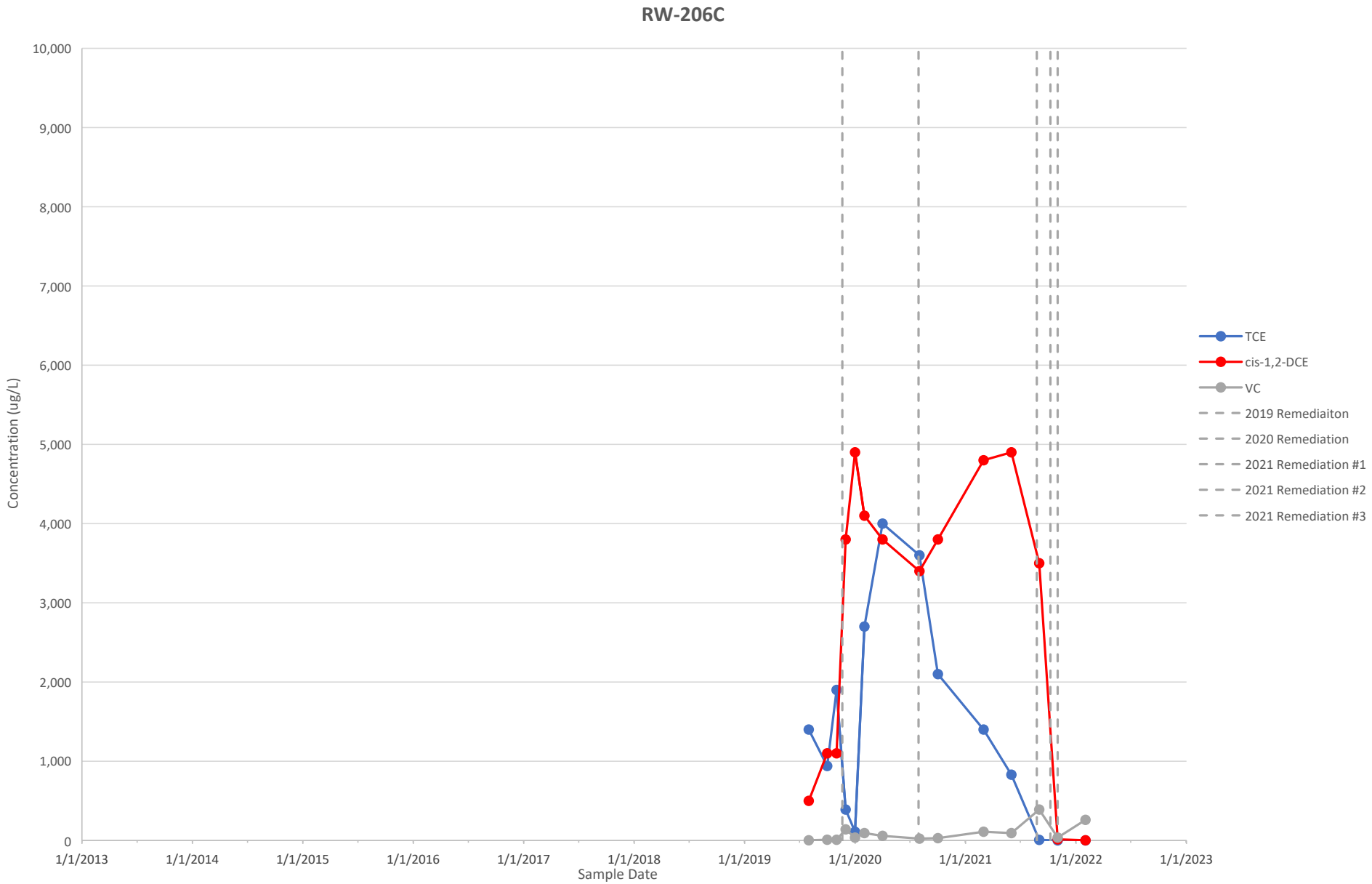

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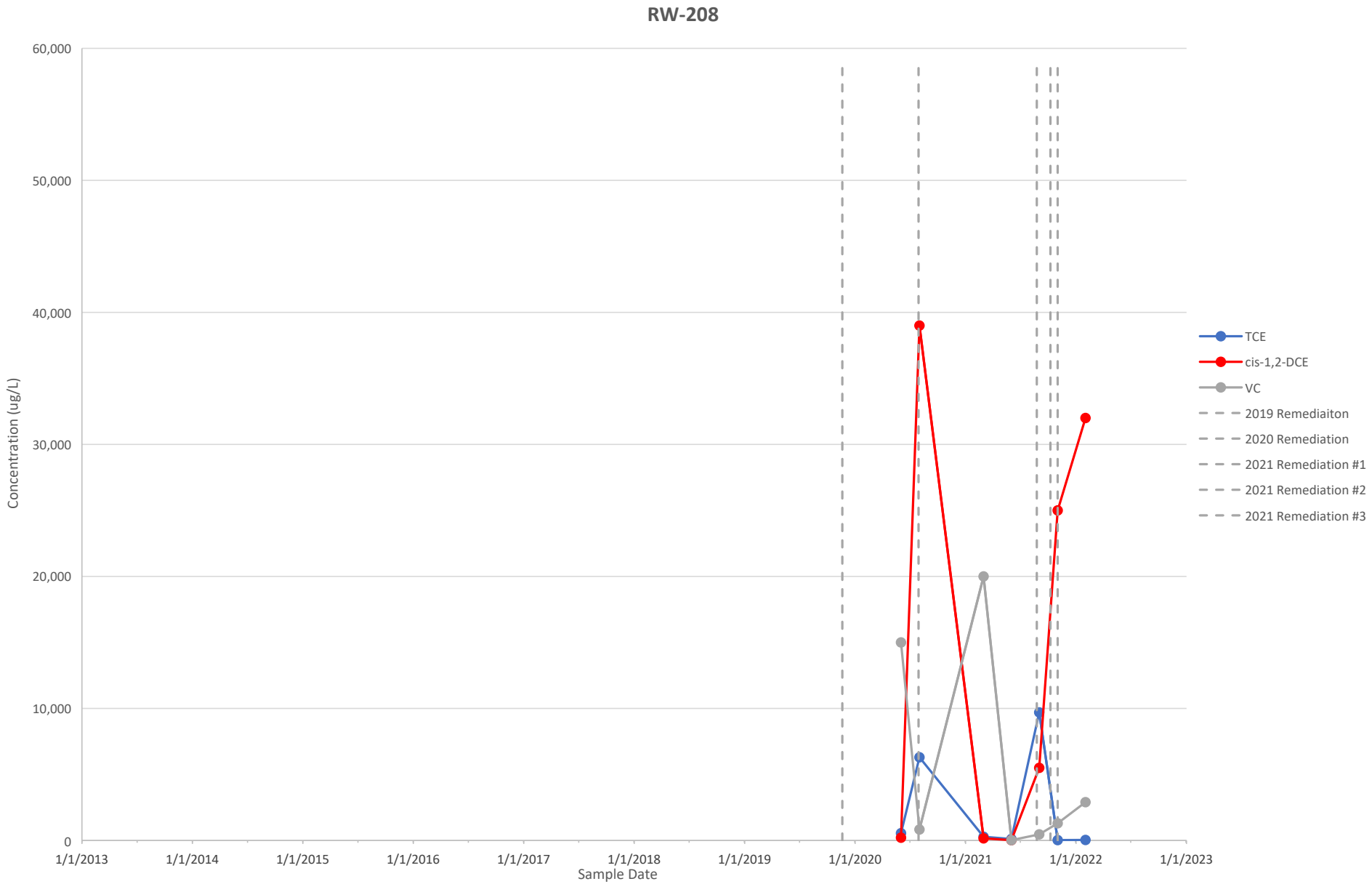

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