Mr. Pete Lopez
Regional Administrator
United States Environmental Protection Agency
Region 2
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New York, NY 10007-1866

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ENVIRONMENT

Subject:
Self-Implementing Cleanup and Disposal Notification for RACER Trust
PCB Remediation Waste
Former Hyatt Clark Industries Site
Clark, New Jersey
Facility EPA ID#: NJD002457174

Date:
April 30, 2020

Contact:
John Messinger

Phone:
201.398.4372

Email:
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Our reference:
30017190

Dear Mr. Lopez:

On behalf of the Revitalizing Auto Communities Environmental Response Trust (RACER Trust), this letter presents a self-implementing cleanup and disposal notification (Notification) for polychlorinated biphenyl (PCB) remediation waste. The waste will be generated during remedial action to be conducted on portions of an inactive Conrail Corporation (Conrail)-owned railroad right-of-way (rail line) and a commercial property (142 Central Avenue, Clark, New Jersey 07066) that are located adjacent to the former Hyatt Clark Industries site (the site [**Figure 1**]). This Notification has been prepared in accordance with the Toxic Substances Control Act (TSCA) regulations presented in Title 40 of the Code of Federal Regulations (40 CFR) Part 761.61(a). A Certification Statement which contains information required under 40 CFR 761.61(a)(3)(i)(E) is provided in **Attachment A** to this Notification.

PCBs have been detected in soil (maximum depth of 8 feet) along the inactive rail line which is located immediately south of the site. The PCBs extend onto a small area of a commercial property immediately south of the inactive rail line. RACER Trust intends to conservatively remediate total PCB concentrations to meet the New Jersey Department of Environmental Protection (NJDEP) Residential Direct Contact Soil Cleanup Criteria (RDCSCC) of 0.2 parts per million (ppm), thus accommodating an unrestricted use remedy for the properties.

The following sections provide additional background information, soil sample results, and the cleanup and disposal plan.

1. BACKGROUND INFORMATION

The former Hyatt Clark Industries site is located at 1300 Raritan Road in Clark, Union County, New Jersey. The site is situated in a mixed commercial and light industrial area, with the inactive Conrail-owned rail line located immediately to the south.

Historical operations at the former facility consisted of the manufacture of hard rubber products, such as steering wheels and door handles, and anti-friction roller bearings for the automotive and railroad industries. Raw materials included multiple grades of alloy steels and bronze alloy castings. Manufacturing processes included hot forming, machining, heat treating, quenching, drawing, tumbling, deburring, and assembly.

The original plant was constructed in 1938 by the Inland Manufacturing Division of General Motors (GM) and consisted of a main building and supporting facilities. Subsequent expansion of the main manufacturing building by the Hyatt Bearings Division of GM occurred in 1944, 1950, 1952, and 1967. In 1981, ownership of the plant was transferred from GM to Hyatt Clark industries, an employee-owned company. Hyatt Clark Industries declared bankruptcy in 1987, and plant operations ceased in August 1987.

In 1989, site ownership reverted to GM. At that time, GM entered into an Administrative Consent Order (ACO) with the NJDEP to conduct investigation and remedial activities pursuant to the New Jersey Industrial Site Recovery Act (ISRA). In addition to ISRA, the Site has closure obligations under RCRA. On-site soil remedial activities were completed and the site was redeveloped as a golf course in 2002. On-going remediation activities for groundwater at and in the vicinity of the site are being conducted in accordance with the New Jersey ISRA requirements. RACER Trust now has responsibility for ongoing and future remedial activities at the site.

2. SOIL SAMPLE RESULTS

A total of 131 soil samples were collected from 52 soil boring locations along the inactive rail line and the adjacent commercial property were and analyzed for total PCBs using USEPA SW-846 Method 8082 **(Table 1)**. The soil sample locations and analytical results are shown on **Figure 2**.

Initial investigation activities were conducted along the inactive rail line during 2004 and 2005. In 2005, GM conducted a soil remedial action that included removal of approximately 200 cubic yards of soil impacted with the highest PCB levels encountered along the inactive rail line. PCB concentrations within the excavation area ranged from 0.69 to 1,070 ppm. The remedial action consisted of excavation and offsite disposal of PCB-impacted soil within the limits shown on **Figure 2**. The remedial action was reported to NJDEP in Progress Report No. 5, dated December 2005 (prepared by URS Corporation).

Additional soil samples were collected along the inactive rail line and commercial property in 2009 and 2016 to delineate the limits of PCB-impacted soil to the 0.2 ppm NJDEP RDCSCC.

3. PROPOSED SELF-IMPLEMENTING CLEANUP AND DISPOSAL PLAN

RACER Trust intends to conservatively remove all soil from the two off-site properties that contain total PCBs at concentrations greater than the NJDEP 0.2 ppm target remediation standard, which is less than

the 1 ppm PCB cleanup goal for bulk PCB remediation waste as presented in 40CFR Part 761.61(a). The proposed self-implementing PCB cleanup and disposal plan is described in the following sections.

Soil Excavation

Soil containing total PCBs at concentrations greater than 0.2 ppm will be removed and transported for off-site disposal. Details of the limits of these excavations and their associated depths are shown on **Figure 3**. Proposed soil excavation and disposal activities will be conducted in accordance with the following:

- Mobilization and site preparation activities. These activities include marking the limits of the excavation areas, identifying subsurface utilities, designating equipment and material staging areas, assembly of a temporary decontamination area for equipment, providing containment for decontamination wash water/storm water (as needed), and installation of erosion and sedimentation controls.
- PCBs were detected at a concentration exceeding 50 ppm at only one sample location (from the 0 to 0.5-foot interval at soil boring SL-19). The field limits of the soil excavation areas and boundaries of TSCA-regulated PCB waste (waste exceeding 50 ppm PCBs) will be established using GPS survey methods. The boundaries will be based on the existing surveyed boring locations described above and shown on **Figure 2**. The soil excavation areas, proposed depth of each excavation area, and limits of TSCA-regulated PCB waste are shown on **Figure 3**.
- Clearing trees and aboveground vegetation within and immediately adjacent to the planned excavation areas. After being felled, tree trunks and limbs will be removed from the excavation areas without being dragged through soil, using an excavator or skid steer. Tree trunks and limbs will then be chipped and placed in roll offs or directly loaded into dump trailers for off-site disposal as non-PCB waste. All below grade roots and root mass within the excavation areas will be removed and disposed of with excavated soils, based on the in-situ concentration of PCBs in soil samples.
- Excavation of approximately 1,393 cubic yards (cy) (2,090 tons) of soil with a total PCB concentration less than 50 ppm of PCBs. RACER Trust anticipates that excavated soil with PCB concentrations less than 50 ppm will either be directly loaded into dump trailers for off-site disposal or placed in a staging area that meets the requirements of 40 CFR Part 761.65(c)(9) for temporary storage prior to being loaded for off-site transport and disposal. In order to profile the excavated soil for disposal, RACER Trust may perform additional in-situ waste characterization, if required by the designated disposal facility.
- Excavating approximately 35 cy (53 tons) of soil with a total PCB concentration equal to or greater than 50 ppm. Soil with PCB concentrations equal to or greater than 50 ppm will be managed as a TSCA-regulated PCB waste and will either be directly-loaded into lined dump trailers (separately from soil that contains less than 50 ppm PCBs) or stockpiled separately in an area that meets the requirements of 40 CFR Part 761.65(c)(9) for temporary storage prior to being loaded for off-site disposal. Groundwater is not expected to be encountered due to the planned shallow depth of the excavations. In the event of precipitation during excavation, soil removal activities may be suspended to allow surface water to either infiltrate or be removed from excavations. If necessary, any water pumped from the excavation will be transferred to an on-site storage tote or tank for characterization and disposal as discussed below in the equipment decontamination section.

Following completion of the excavation activities, RACER Trust will collect post-excavation verification samples for laboratory analysis from the bottom of the excavation areas as described below. Upon reaching the proposed depth of each excavation area, post-excavation samples will be collected to a depth of approximately 0.5 feet into the remaining (unexcavated) soil. After post-excavation verification samples indicate that soil cleanup objectives have been achieved, the excavation areas will be backfilled to existing grade using fill materials obtained from an off-site borrow source (such as quarry/mine material from a licensed mine). Areas disturbed by the remediation activities will be seeded and mulched. Erosion and sedimentation controls will remain in place until a vegetative cover is established.

RACER Trust anticipates that soil remediation activities will begin during the summer of 2020 and will require approximately four weeks to complete.

Post-Excavation Verification Sampling

RACER Trust proposes to collect post-excavation verification samples as shown on **Figure 3**. Approximately 25 post-excavation samples will be collected from an overall excavation area of approximately 9,900 square feet, which provides a sample density of approximately one sample per every approximately 400 square feet of excavation area. The actual sample locations have been selected to target each area of different excavation depth, using a 20-foot by 20-foot sampling grid area across the larger uniform sampling areas. Excavation limits will extend horizontally to locations of site characterization soil samples than are less than the soil cleanup objective (less than 0.2 ppm total PCBs). Additional post-excavation sidewall samples will be collected as needed to provide a final sidewall sample spacing of approximately one sample per every 30 feet along the excavation perimeter. The post-excavation samples will be submitted for laboratory analysis for total PCBs using USEPA SW-846 Method 8082.

Each post-excavation verification sample will be collected as an individual discrete sample. Analytical results for discrete samples will be compared to soil cleanup objectives. If any of the samples contain PCBs at a concentration exceeding 0.2 ppm (the target cleanup objective), additional rounds of excavation and sampling will be performed until the target cleanup objectives have been met.

Disposal

Wastes and cleaning materials generated by the remedial action will be managed in accordance with PCB remediation waste disposal requirements established under TSCA regulations. Wastes containing PCBs at concentrations equal to or greater than 50 ppm, based on in-place sampling results (or non-porous surfaces with surface PCB concentrations exceeding 10 µg/100 cm2), will be transported for off-site disposal as a TSCA-regulated PCB waste at a TSCA-permitted chemical waste landfill or a RCRA-permitted Subtitle C landfill. Wastes containing PCBs at concentrations less than 50 ppm, based on in-place sampling results (or non-porous surfaces with surface PCB concentrations equal to or less than 10 µg/100 cm2), will be managed as non-TSCA-regulated waste and will be transported for disposal at a municipal solid waste landfill (Subtitle D facility). PCB-containing liquid waste generated by excavation and/or decontamination activities covered under this Notification will either be disposed of as a TSCA-regulated PCB waste or treated, if necessary, in accordance with the PCB decontamination standards presented in 40 CFR 761.79.

Decontamination Procedures for Soil Handling Equipment

During implementation of the remedial action, equipment decontamination will be required prior to:

- Moving equipment from a TSCA-regulated excavation area into the remedial action support zone.
- Using equipment (excavator, front end loader, or other vehicle) that was previously used to handle TSCA-regulated material, to handle materials containing less than 50 ppm PCBs.
- Demobilizing equipment that was used to excavate or manage TSCA and non-TSCA-regulated materials from the Site.

Prior to managing materials containing less than 50 ppm PCBs, or moving from the TSCA excavation area into the remedial action support zone, all equipment that was previously used to excavate or handle TSCA-regulated material will be moved to a temporary decontamination pad (to be located in the work area) where the equipment will be cleaned via dry scraping and pressure washers to remove bulk material that could potentially contain PCBs. In situations where equipment is being re-positioned from a TSCA-regulated work area to a work area where PCB concentrations are less than 50 ppm, it will be necessary to decontaminate the entire piece of equipment, including tracks and equipment body. In situations where tracking of TSCA-regulated waste is not a concern, only the equipment surfaces that were previously in contact with TSCA-regulated waste will be decontaminated. Equipment will be triple-rinsed and visually inspected to confirm the removal of adhered soil or other materials. All solid waste materials generated by decontamination of equipment that was used to handled TSCA-regulated waste will be collected and managed as TSCA-regulated PCB waste for disposal purposes. All water generated by decontamination activities shall be captured in a tote or poly tank for disposal and/or treatment as described above.

Prior to demobilization from the Site, construction equipment used to excavate or handle TSCA and non-TSCA-regulated waste will be moved from the work area (contamination zone) to a decontamination pad (located in the contaminant reduction zone) where the equipment will be cleaned via dry scraping and pressure washers to remove bulk material that could potentially contain PCBs. Equipment will be triple-rinsed and visually inspected to confirm the removal of adhered soil or other materials. All solid waste materials generated by the decontamination of equipment that was previously used to handle TSCA-regulated waste will be collected and disposed of as TSCA-regulated PCB waste. Soil waste materials generated by the decontamination of equipment that was used to handle non-TSCA-regulated waste will be collected for disposal as either a TSCA or non-TSCA waste based on waste characterization sampling results. All water generated by decontamination activities shall be captured in a tote or poly tank for disposal and/or treatment as described above.

After the equipment is cleaned and prior to demobilization from the Site, standard PCB wipe samples (10-centimeter [cm] by 10-cm, as defined in 40 CFR Part 761.123) will be collected from surfaces of the equipment that would have been in primary contact with the soil in the excavation areas (i.e., excavator bucket, excavator tracks, and excavator underbody). Wipe samples will be collected at a frequency of one sample per every 100 square feet of equipment surface area, with a maximum of three samples for any individual piece of equipment. The wipe samples will be submitted for laboratory analysis in accordance with USEPA SW-846 Method 8082. If PCBs are detected for any of the wipe samples at concentrations equal to or exceeding 10 µg/100 cm2, the portion of the equipment represented by that sample will be pressure washed again and additional samples will be collected until acceptable wipe

sample results are achieved. After acceptable wipe sampling results are obtained for the equipment, it will be demobilized from the job site.

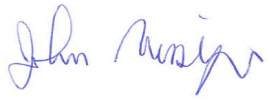
4. CONCLUSION

The self-implementing cleanup and disposal activities described in this Notification are appropriate for the two off-site properties. The proposed self-implementing activities are technically sound and protective of human health and the environment. RACER Trust requests that the USEPA approve the self-implementing cleanup and disposal activities described herein.

Please do not hesitate to contact me at 201-398-4372 or by e-mail at john.messger@arcadis.com if you have questions.

Sincerely,

Arcadis U.S., Inc.



John Messinger
Certified Project Manager 2

Copies:

Robert Hare, RACER Trust
Benny Conetta, USEPA Region 2
Michael C. Jones, Arcadis

Enclosures:

Tables

1 Soil Analytical Results for PCBs

Figures

1 Site Location Map

2 Total PCB Concentrations

3 Excavation Areas and Verification Sampling Locations

Attachments

A Certification Statement

Table 1
Soil Analytical Results for PCBs (ppm)
Former Hyatt Clark Industries
Clark, New Jersey

ARCADIS Design & Consultancy for natural and built assets

Sample ID	Depth (feet)	Date Collected	Total PCBs
SL-1B	1.5-2	6/9/2004	**89**
	3.5-4	6/30/2005	**3.39**
SL-2B	1.5-2	6/9/2004	**92**
	3.5-4	6/30/2005	**116**
	5.5-6	6/30/2005	**0.8**
	6.5-8	6/30/2005	**0.56**
	8.5 - 9.0	12/6/2016	0.0222 J
SL-3B	1.5-2	6/9/2004	**1070**
	3.5-4	6/30/2005	**30.7**
SL-4B	1.5-2	6/9/2004	**30.8**
SL-05	0-0.5	8/20/2004	**39**
	1.5-2	8/20/2004	**38**
SL-06	0-0.5	8/20/2004	**33**
	1.5-2	8/20/2004	**25**
SL-07	0-0.5	8/20/2004	**22.8**
	1.5-2	8/20/2004	**13.3**
	3.5-4	6/30/2005	**4**
SL-09	0-0.5	8/20/2004	**29**
	1.5-2	8/20/2004	**49**
	3.5-4	6/30/2005	**0.81**
SL-10	0-0.5	8/20/2004	**205**
	1.5-2	8/20/2004	**86**
	3.5-4	6/30/2005	**10.1**
SL-11	0-0.5	8/20/2004	**84**
	1.5-2	8/20/2004	**40**
	3.5-4	6/30/2005	**4**
SL-12	0-0.5	12/16/2004	**23**
	1.5-2	12/16/2004	**4.8**
SL-13	0-0.5	12/16/2004	**107**
	1.5-2	12/16/2004	**840**
	3.5-4	6/30/2005	**79**
	5.5-6	6/30/2005	**0.92**
	6.5-8	6/30/2005	**0.34**
	8.5-9.0	12/6/2016	0.00654 J
SL-14	0-0.5	12/16/2004	**11.6**
	1.5-2	12/16/2004	**16.7**
	1.5-2	12/6/2016	**18.5**

Table 1
Soil Analytical Results for PCBs (ppm)
Former Hyatt Clark Industries
Clark, New Jersey

ARCADIS Design & Consultancy for natural and built assets

Sample ID	Depth (feet)	Date Collected	Total PCBs
SL-15	0-0.5	12/16/2004	**22.5**
	0-0.5	12/6/2016	**6.1**
	1.5-2	12/16/2004	**0.8**
SL-16	0-0.5	12/16/2004	**1.25**
	1.5-2	12/16/2004	**5.3**
SL-17	0-0.5	1/10/2005	**64**
	0-2	1/10/2005	**64**
	1.5-2	1/10/2005	**48**
	3.5-4	6/30/2005	**6**
SL-18	0-0.5	1/10/2005	**630**
	1.5-2	1/10/2005	**29**
	3.5-4	6/30/2005	**102**
	5.5-6	6/30/2005	**0.48**
	6.5-8	6/30/2005	0.077 U
SL-19	0-0.5	1/10/2005	**19.4**
	0.0-0.5	12/6/2016	**50.7**
	1.5-2	1/10/2005	**9.6**
SL-20	0-0.5	1/10/2005	**5.5**
	0.0-0.5	12/6/2016	**19.3**
	1.5-2	1/10/2005	**0.32**
SL-21	0-0.5	2/14/2005	**18**
	1.5-2	2/14/2005	**2.5**
	3.5-4	6/30/2005	**10.2**
	3.5-4.0	12/6/2016	0.00184 U
SL-22	0-0.5	2/14/2005	**6.6**
	1.5-2	2/14/2005	**0.69**
SL-23	0-0.5	2/14/2005	**28**
	1.5-2	2/14/2005	**74**
	3.5-4	6/30/2005	**16.5**
SL-24	0-0.5	2/14/2005	**8.2**
	1.5-2	2/14/2005	**2.8**
	3.5-4	6/30/2005	0.085 U
SL-25	0-0.5	2/14/2005	**8.3**
	1.5-2	2/14/2005	**20.2**
	1.5-2	12/6/2016	**10.5**
SL-26	0-0.5	2/14/2005	0.081 U
	1.5-2	2/14/2005	0.079 U
SL-27	0-0.5	3/21/2005	**0.097**
	1.5-2	3/21/2005	**4.4**
SL-28	0-0.5	3/21/2005	**2.03**
	1.5-2	3/21/2005	**1.48**

Table 1
Soil Analytical Results for PCBs (ppm)
Former Hyatt Clark Industries
Clark, New Jersey

ARCADIS Design & Consultancy for natural and built assets

Sample ID	Depth (feet)	Date Collected	Total PCBs
SL-29	0-0.5	3/21/2005	**4.5**
	1.5-2	3/21/2005	**5.4**
SL-30	0-0.5	3/21/2005	**4.8**
	1.5-2	3/21/2005	**1.34**
	2-2.5	12/6/2016	0.0126 J
SL-31	0-0.5	3/21/2005	**4.3**
	1.5-2	3/21/2005	0.15
SL-32	0-0.5	3/21/2005	**3.6**
	1.5-2	3/21/2005	**4.09**
SL-33	0-0.5	3/21/2005	**2.15**
	1.5-2	3/21/2005	**1.43**
SL-34	0-0.5	3/21/2005	0.078 U
	1.5-2	3/21/2005	0.076 U
SL-35	0-0.5	6/30/2005	0.082 U
	1.5-2	6/30/2005	**0.48**
	3.5-4	6/30/2005	**3.4**
SL-36	3.5-4	6/30/2005	0.12
SL-37	3.5-4	6/30/2005	0.078 U
SL-38	0-0.5	12/11/2009	**0.51**
	1.5-2.0	12/11/2009	0.021 J
SL-39	0-0.5	12/11/2009	**1.15**
	1.5-2.0	12/11/2009	0.027 J
	3.5-4.0	12/11/2009	0.059 J
	5.5-6.0	12/11/2009	0.077 U
SL-40	0-0.5	12/11/2009	**0.999 J**
	1.5-2.0	12/11/2009	0.049 J
	3.5-4.0	12/11/2009	0.081 U
	5.5-6.0	12/11/2009	0.076 U
SL-41	0-0.5	12/11/2009	**0.73**
	1.5-2.0	12/11/2009	**0.4**
	2.0 - 2.5	12/6/2016	0.00188 U
	3.5-4.0	12/11/2009	0.077 U
	5.5-6.0	12/11/2009	0.075 U
SL-42	0-0.5	12/11/2009	**4.7**
	1.5-2.0	12/11/2009	0.035 J
SL-43	0-0.5	12/11/2009	**1.32**
	1.5-2.0	12/11/2009	0.09
SL-44	0.0 - 0.5	12/6/2016	0.145
SL-46	0.0 - 2.0	12/6/2016	0.00192 U
	1.5 - 2.0	12/6/2016	0.022 J
	2.0 - 2.5	12/6/2016	0.0129 J
	2.5 - 3.0	12/6/2016	0.0018 U
SL-47	0.0 - 0.5	12/6/2016	0.0105 J
SL-48	0.0 - 0.5	12/6/2016	0.0354 J
SL-49	0.0 - 0.5	12/6/2016	0.00209 U

Table 1
Soil Analytical Results for PCBs (ppm)
Former Hyatt Clark Industries
Clark, New Jersey

Sample ID	Depth (feet)	Date Collected	Total PCBs
SL-51	0.0 - 0.5	12/6/2016	**0.286**
	1.5 - 2.0	12/6/2016	0.0212 J
	2.0 - 2.5	12/6/2016	0.0116 J
	2.5 - 3.0	12/6/2016	0.00502 J
SL-51A	0.0 - 0.5	12/6/2016	0.109
SL-52	0.0 - 0.5	12/6/2016	**0.449**
SL-52A	0.0 - 0.5	12/6/2016	**0.389**
SL-52B	0.0 - 0.5	12/6/2016	0.027

Notes:

1. Samples collected by Arcadis on the dates indicated.
2. Concentrations reported in miligrams per kilogram, which are equivalent to parts per million (ppm).
3. Duplicate sample results are presented in brackets [ ].
4. J = Estimate value.
5. U = The analyte was not detected. The value preceding the U indicates the detection limit.
6. Bold values indicate a total PCB concentration exceeding the 0.2 ppm New Jersey Department of Environmental Protection Residential Direct Contact Soil Remediation Standard
7. Blue shading indicates the soil at this sample location has been excavated and trasnported offsite for disposal.
8. Orange shading indicates a total PCB concentration exceeding the 50 ppm

CITY: SAN FRANCISCO DIV/GROUP: ENV/IM DB: akens LD: PIC: PM: TM:
PROJECT PATH: Z:\GISProjects_ENV\Hyatt Clark\MXDs\Self-Implementing WP\HyattClark_SiteLocationMap.mxd DATE: 10/21/2019 2:49:05 PM

LEGEND:

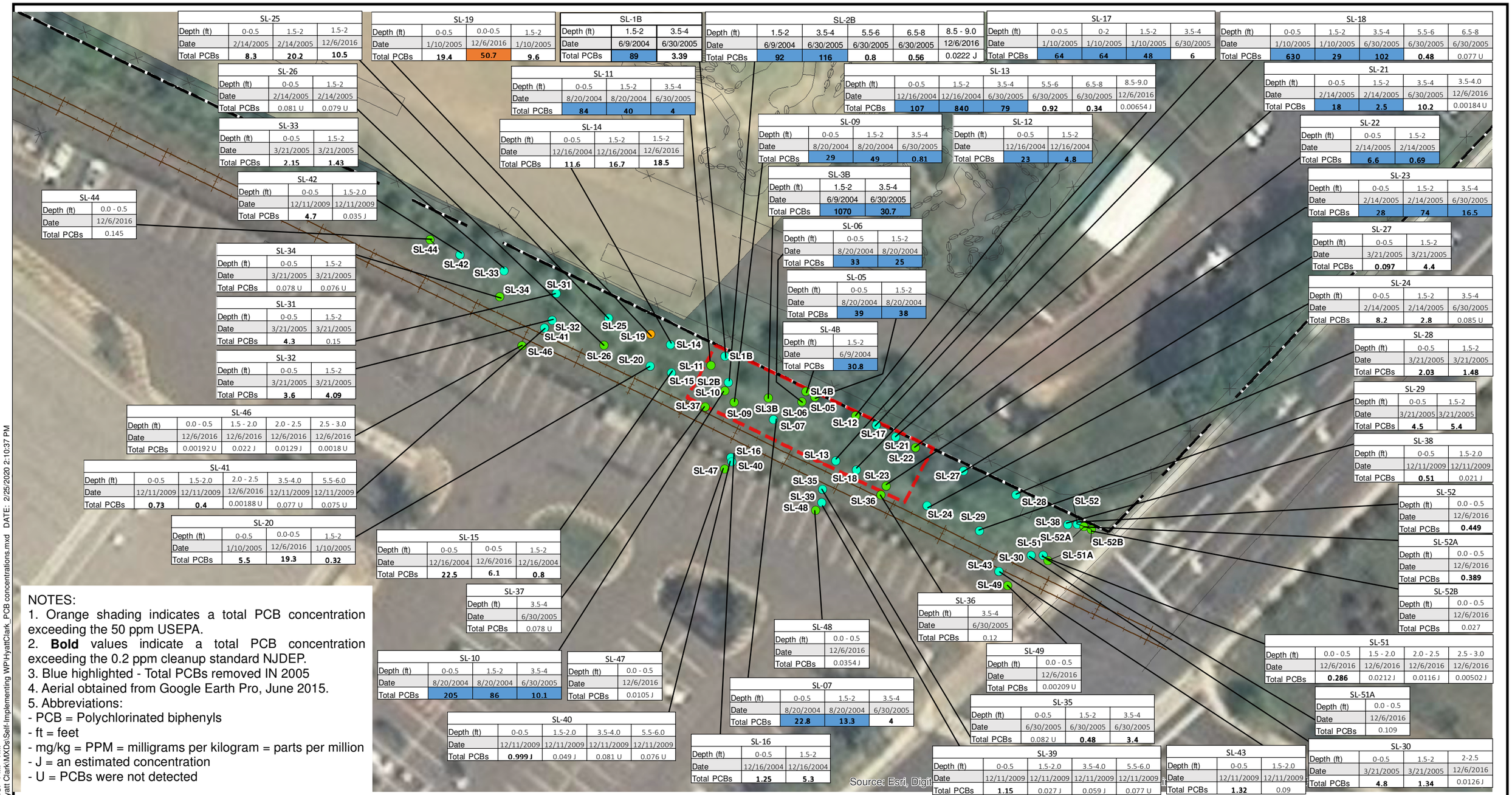
- Parcel Boundary
- Site Location

FORMER HYATT CLARK INDUSTRIES
1300 RARITAN RD
CLARK, NJ
SELF-IMPLEMENTING WORK PLAN

SITE LOCATION MAP

ARCADIS

FIGURE
1



SL-25			
Depth (ft)	0-0.5	1.5-2	1.5-2
Date	2/14/2005	2/14/2005	12/6/2016
Total PCBs	**8.3**	**20.2**	**10.5**

SL-19			
Depth (ft)	0-0.5	0.0-0.5	1.5-2
Date	1/10/2005	12/6/2016	1/10/2005
Total PCBs	**19.4**	**50.7**	**9.6**

SL-1B		
Depth (ft)	1.5-2	3.5-4
Date	6/9/2004	6/30/2005
Total PCBs	**89**	**3.39**

SL-2B					
Depth (ft)	1.5-2	3.5-4	5.5-6	6.5-8	8.5 - 9.0
Date	6/9/2004	6/30/2005	6/30/2005	6/30/2005	12/6/2016
Total PCBs	**92**	**116**	**0.8**	**0.56**	0.0222 J

SL-17				
Depth (ft)	0-0.5	0-2	1.5-2	3.5-4
Date	1/10/2005	1/10/2005	1/10/2005	6/30/2005
Total PCBs	**64**	**64**	**48**	**6**

SL-18					
Depth (ft)	0-0.5	1.5-2	3.5-4	5.5-6	6.5-8
Date	1/10/2005	1/10/2005	6/30/2005	6/30/2005	6/30/2005
Total PCBs	**630**	**29**	**102**	**0.48**	0.077 U

SL-26		
Depth (ft)	0-0.5	1.5-2
Date	2/14/2005	2/14/2005
Total PCBs	0.081 U	0.079 U

SL-11			
Depth (ft)	0-0.5	1.5-2	3.5-4
Date	8/20/2004	8/20/2004	6/30/2005
Total PCBs	**84**	**40**	**4**

SL-13						
Depth (ft)	0-0.5	1.5-2	3.5-4	5.5-6	6.5-8	8.5-9.0
Date	12/16/2004	12/16/2004	6/30/2005	6/30/2005	6/30/2005	12/6/2016
Total PCBs	**107**	**840**	**79**	**0.92**	**0.34**	0.00654 J

SL-21				
Depth (ft)	0-0.5	1.5-2	3.5-4	3.5-4.0
Date	2/14/2005	2/14/2005	6/30/2005	12/6/2016
Total PCBs	**18**	**2.5**	**10.2**	0.00184 U

SL-33		
Depth (ft)	0-0.5	1.5-2
Date	3/21/2005	3/21/2005
Total PCBs	**2.15**	**1.43**

SL-14			
Depth (ft)	0-0.5	1.5-2	1.5-2
Date	12/16/2004	12/16/2004	12/6/2016
Total PCBs	**11.6**	**16.7**	**18.5**

SL-09			
Depth (ft)	0-0.5	1.5-2	3.5-4
Date	8/20/2004	8/20/2004	6/30/2005
Total PCBs	**29**	**49**	**0.81**

SL-12		
Depth (ft)	0-0.5	1.5-2
Date	12/16/2004	12/16/2004
Total PCBs	**23**	**4.8**

SL-22		
Depth (ft)	0-0.5	1.5-2
Date	2/14/2005	2/14/2005
Total PCBs	**6.6**	**0.69**

SL-42		
Depth (ft)	0-0.5	1.5-2.0
Date	12/11/2009	12/11/2009
Total PCBs	**4.7**	0.035 J

SL-3B		
Depth (ft)	1.5-2	3.5-4
Date	6/9/2004	6/30/2005
Total PCBs	**1070**	**30.7**

SL-23			
Depth (ft)	0-0.5	1.5-2	3.5-4
Date	2/14/2005	2/14/2005	6/30/2005
Total PCBs	**28**	**74**	**16.5**

SL-44	
Depth (ft)	0.0 - 0.5
Date	12/6/2016
Total PCBs	0.145

SL-06		
Depth (ft)	0-0.5	1.5-2
Date	8/20/2004	8/20/2004
Total PCBs	**33**	**25**

SL-27		
Depth (ft)	0-0.5	1.5-2
Date	3/21/2005	3/21/2005
Total PCBs	**0.097**	**4.4**

SL-34		
Depth (ft)	0-0.5	1.5-2
Date	3/21/2005	3/21/2005
Total PCBs	0.078 U	0.076 U

SL-05		
Depth (ft)	0-0.5	1.5-2
Date	8/20/2004	8/20/2004
Total PCBs	**39**	**38**

SL-24			
Depth (ft)	0-0.5	1.5-2	3.5-4
Date	2/14/2005	2/14/2005	6/30/2005
Total PCBs	**8.2**	**2.8**	0.085 U

SL-31		
Depth (ft)	0-0.5	1.5-2
Date	3/21/2005	3/21/2005
Total PCBs	**4.3**	0.15

SL-4B	
Depth (ft)	1.5-2
Date	6/9/2004
Total PCBs	**30.8**

SL-28		
Depth (ft)	0-0.5	1.5-2
Date	3/21/2005	3/21/2005
Total PCBs	**2.03**	**1.48**

SL-32		
Depth (ft)	0-0.5	1.5-2
Date	3/21/2005	3/21/2005
Total PCBs	**3.6**	**4.09**

SL-29		
Depth (ft)	0-0.5	1.5-2
Date	3/21/2005	3/21/2005
Total PCBs	**4.5**	**5.4**

SL-46				
Depth (ft)	0.0 - 0.5	1.5 - 2.0	2.0 - 2.5	2.5 - 3.0
Date	12/6/2016	12/6/2016	12/6/2016	12/6/2016
Total PCBs	0.00192 U	0.022 J	0.0129 J	0.0018 U

SL-38		
Depth (ft)	0-0.5	1.5-2.0
Date	12/11/2009	12/11/2009
Total PCBs	**0.51**	0.021 J

SL-41					
Depth (ft)	0-0.5	1.5-2.0	2.0 - 2.5	3.5-4.0	5.5-6.0
Date	12/11/2009	12/11/2009	12/6/2016	12/11/2009	12/11/2009
Total PCBs	**0.73**	**0.4**	0.00188 U	0.077 U	0.075 U

SL-52	
Depth (ft)	0.0 - 0.5
Date	12/6/2016
Total PCBs	**0.449**

SL-20			
Depth (ft)	0-0.5	0.0-0.5	1.5-2
Date	1/10/2005	12/6/2016	1/10/2005
Total PCBs	**5.5**	**19.3**	**0.32**

SL-52A	
Depth (ft)	0.0 - 0.5
Date	12/6/2016
Total PCBs	**0.389**

SL-52B	
Depth (ft)	0.0 - 0.5
Date	12/6/2016
Total PCBs	0.027

SL-15			
Depth (ft)	0-0.5	0-0.5	1.5-2
Date	12/16/2004	12/6/2016	12/16/2004
Total PCBs	**22.5**	**6.1**	**0.8**

SL-37	
Depth (ft)	3.5-4
Date	6/30/2005
Total PCBs	0.078 U

SL-36	
Depth (ft)	3.5-4
Date	6/30/2005
Total PCBs	0.12

SL-48	
Depth (ft)	0.0 - 0.5
Date	12/6/2016
Total PCBs	0.0354 J

SL-49	
Depth (ft)	0.0 - 0.5
Date	12/6/2016
Total PCBs	0.00209 U

SL-51				
Depth (ft)	0.0 - 0.5	1.5 - 2.0	2.0 - 2.5	2.5 - 3.0
Date	12/6/2016	12/6/2016	12/6/2016	12/6/2016
Total PCBs	**0.286**	0.0212 J	0.0116 J	0.00502 J

SL-10				
Depth (ft)	0-0.5	1.5-2	3.5-4	
Date	8/20/2004	8/20/2004	6/30/2005	
Total PCBs	**205**	**86**	**10.1**	

SL-47	
Depth (ft)	0.0 - 0.5
Date	12/6/2016
Total PCBs	0.0105 J

SL-07			
Depth (ft)	0-0.5	1.5-2	3.5-4
Date	8/20/2004	8/20/2004	6/30/2005
Total PCBs	**22.8**	**13.3**	**4**

SL-35			
Depth (ft)	0-0.5	1.5-2	3.5-4
Date	6/30/2005	6/30/2005	6/30/2005
Total PCBs	0.082 U	**0.48**	**3.4**

SL-51A	
Depth (ft)	0.0 - 0.5
Date	12/6/2016
Total PCBs	0.109

SL-40				
Depth (ft)	0-0.5	1.5-2.0	3.5-4.0	5.5-6.0
Date	12/11/2009	12/11/2009	12/11/2009	12/11/2009
Total PCBs	**0.999 J**	0.049 J	0.081 U	0.076 U

SL-16		
Depth (ft)	0-0.5	1.5-2
Date	12/16/2004	12/16/2004
Total PCBs	**1.25**	**5.3**

SL-39				
Depth (ft)	0-0.5	1.5-2.0	3.5-4.0	5.5-6.0
Date	12/11/2009	12/11/2009	12/11/2009	12/11/2009
Total PCBs	**1.15**	0.027 J	0.059 J	0.077 U

SL-43		
Depth (ft)	0-0.5	1.5-2.0
Date	12/11/2009	12/11/2009
Total PCBs	**1.32**	0.09

SL-30			
Depth (ft)	0-0.5	1.5-2	2-2.5
Date	3/21/2005	3/21/2005	12/6/2016
Total PCBs	**4.8**	**1.34**	0.0126 J

NOTES:
1. Orange shading indicates a total PCB concentration exceeding the 50 ppm USEPA.
2. **Bold** values indicate a total PCB concentration exceeding the 0.2 ppm cleanup standard NJDEP.
3. Blue highlighted - Total PCBs removed IN 2005
4. Aerial obtained from Google Earth Pro, June 2015.
5. Abbreviations:
- PCB = Polychlorinated biphenyls
- ft = feet
- mg/kg = PPM = milligrams per kilogram = parts per million
- J = an estimated concentration
- U = PCBs were not detected

LEGEND:

- Soil Boring
- Cap Area
- 2005 EXCAVATION AREA
- Property Boundary
- Current Features
- Fence
- Railroad

SOIL BORING CONCENTRATION KEY:

- Non Detected and or <0.2 mg/kg At Any Depth
- Detections >0.2 mg/kg and <50 ppm At One or More Depths
- Detections >50ppm At One or More Depths

0 40 80
SCALE IN FEET

FORMER HYATT CLARK INDUSTRIES
1300 RARITAN RD
CLARK, NJ
SELF-IMPLEMENTING WORK PLAN

TOTAL PCB CONCENTRATIONS

ARCADIS

FIGURE
2

DIV/GROUP: ENV/MDV DB: akens LD: PIC: PM: TM:
PROJECT: PATH: Z:\GISProjects_ENV\Hyatt Clark\MXDs\Self-Implementing WP\HyattClark_PCB concentrations.mxd DATE: 2/25/2020 2:10:37 PM

NOTES:
1. AERIAL OBTAINED FROM GOOGLE EARTH PRO, JUNE 2015.
2. VERIFICATION SAMPLE LOCATIONS TO BE TAKEN AT 0 - 6 INCHES BELOW THE BOTTOM OF THE EXCAVATION SPECIFIC DEPTH (SHOWN BY THE RESPECTIVE COLOR)
3. THE VERIFICATION SAMPLE TO BE COLLECTED IN THE TSCA AREA WILL BE TAKEN AFTER THE TSCA EXCAVATION FROM 1.5 FT TO 2.0 FT BGS PRIOR TO EXCAVATING THE 1.5 FT TO 2.5 FT NON-TSCA EXCAVATION.

LEGEND:

- Soil Boring
- Proposed Verification sample
- 20'x20' Grid
- 2005 Excavation
- Area of Interest
- Cap Area
- Property Boundary
- Current Features
- Fence
- Railroad
- Overhead Wire
- Gas Line
- Pole
- Electric Box
- Electric Meter
- Gas Marker
- Non-Detected and or <0.2 mg/kg At Any Detections
- Detections >0.2 mg/kg and <50 ppm At One or More Depth
- Detections >50ppm At One or More Depths
- Clean Fill from 0-4.0 ft bgs. No Analytical Data Below 4.0 ft bgs
- Excavate from 0-1.5 ft bgs (TSCA) Excavate from 1.5-2.5 ft bgs non-TSCA
- Excavate 0-1.0 ft bgs
- Excavate 0-2.5 ft bgs
- Excavate 0-4.5 ft bgs
- Excavate 0-6.5 ft bgs
- Excavate 0-8.5 ft bgs

0 25 50
SCALE IN FEET

FORMER HYATT CLARK INDUSTRIES
1300 RARITAN RD
CLARK, NJ
SELF-IMPLEMENTING WORK PLAN

EXCAVATION AREAS AND VERIFICATION SAMPLING LOCATIONS

ARCADIS

FIGURE 3

DIV/GROUP: ENV/IMDV DB: akens LD: PIC: PM: TM:
PROJECT: PATH: Z:\GISProjects_ENV\Hyatt Clark\MXDs\Self-Implementing WP\HyattClark_ExcavUpdateVerifSamplerev3.mxd DATE: 4/15/2020 3:10:07 PM

40 CFR 761.61 Certification

In accordance with 40 CFR 761.61(a)(3)(i)(E), the undersigned owner of the property where the cleanup site is located and the party conducting the cleanup certify that all sampling plans, sampling collection procedures, sample preparation procedures, extraction procedures and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site are on file at the location indicated below and are available for EPA inspection, as set forth below.

Document Location

Arcadis U.S., Inc.

17-17 Route 208 North, Suite 290 West

Fair Lawn, New Jersey 07410

Party Conducting the Cleanup

Authorized Signature

3-17-2020

Date

Robert Hare

Name of Authorized representative (print)

RACER Trust, Cleanup Manager (IL, IN, KS, MO, NJ, WI)

Title