

Construction Completion Report

Ewing Township Industrial Land Wetland and Riparian Zone Mitigation Project BLOCK 343 LOT 1, EWING TOWNSHIP MERCER COUNTY, NEW JERSEY

**NJDEP Permit No. 1102-06-0001.1
(FHA 110001; FWW 110001)**

December 2019

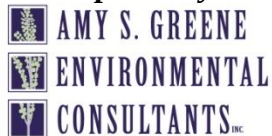
Prepared For:

Haley & Aldrich, Inc.
299 Cherry Hill Road Suite 303
Parsippany, NJ 07054

Submitted To:

New Jersey Department of Environmental Protection, Division of Land Use Regulation
P.O. Box 439, 501 East State Street, 2nd Floor
Trenton, NJ 08625-0439

Prepared By:



Amy S. Greene Environmental Consultants, Inc.
4 Walter E. Foran Boulevard, Suite 209
Flemington, New Jersey 08822

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SECTION #1

Wetland Mitigation Project Completion of Construction Form

WETLAND MITIGATION PROJECT COMPLETION OF CONSTRUCTION FORM

The completion of this form is a requirement of the NJDEP authorization of a wetland mitigation project. **THIRTY DAYS** following the completion of construction of the wetland mitigation project, complete this form and include it with your as-built mitigation report. Send all documents to the address referenced below.

The Completion of this Form Hereby Certifies that I,

Craig Metzger, [Signature], 3/26/19
(Print Name) (Signature) (Date)

of the Consulting Firm: Amy S. Greene Environmental Consultants, Inc.
supervised the construction of the referenced wetland/state open water mitigation project, I was present during critical stages of construction to confirm that all conditions of the mitigation approval were adhered to, that the anticipated hydrology was achieved and hereby certify that the project was constructed in conformance with all njdep approved plans and specifications cited below, including field adjustments agreed upon during onsite meetings with NJDEP mitigation staff on the following dates: _____.

PERMIT NUMBER(S) _____ NJDEP FHAIP File #1102-06-0001.1 FHA 110001; FWWGP-4 File No.1102-06-0001.1 FWW 110001

ISSUANCE DATE _____ Revised approval February 12, 2018

NAME OF PERMITTEE _____ Motors Liquidation Company

PROJECT NAME _____ Ewing Twp. Industrial Land Site

AS-BUILT SURVEY IS IDENTIFIED AS _____

_____ "Ewing Township Industrial Site- Site Plan", dated April 2018
_____ Prepared by: Haley Aldrich

ADDRESS OF FIRM _____ 6500 Rockside Road | Suite 200
_____ Independence, OH 44131

TELEPHONE # _____ (216) 706.1309

E-MAIL ADDRESS _____ cmetzgar@amygreene.com

FAX # _____ NA

SEND TO: State of New Jersey Department of Environmental Protection, Division of Land Use Regulation, Mail Code 02A, P.O. Box 420, Trenton, NJ 08625-0420, ATTN: Mitigation Section

SECTION #2

Construction Completion Report

Amy S. Greene Environmental Consultants, Inc. (ASGECI) was retained by Haley Aldrich (H&A) on behalf of the RACER Trust to prepare this report as a formal notification for completion of the wetland mitigation associated with the remediation of the RACER Trust Industrial Land Site (Former Delphi Interiors & Lighting Division). The subject property is off Parkway Avenue in Ewing Township, Mercer County, New Jersey (Figures 1, and 2, Appendix A). The original project area has been subdivided and is now identified by Ewing Township as Block 343 Lot 1.01 (~76 acres), and a smaller parcel in the SE corner of the Site, Block 343 Lot 1.03 (~4 acres).

The initial remedial construction activities were performed in accordance with the project scope of work and Flood Hazard Area Individual Permit and Freshwater Wetlands General Permit No.4 (NJDEP FHAIP File #1102-06-0001.1 FHA 110001; FWWGP-4 File No.1102-06-0001.1 FWW 110001). The project impacted approximately 2.75 acres of freshwater wetlands, transition areas, and riparian zones.

Remedial construction activities within the mitigation project commenced in August 2011 and were completed in April 2012 following initial planting. Approximately 2.75 acres were planted with 1700 containerized trees. Initial restoration planting was completed from April 23-27, 2012. Supplemental planting of containerized woody vegetation and the installation of deer exclusion fencing was completed from May 20-23, 2013 and on April 28, 2016. The Final Mitigation Monitoring Report was submitted to the Mitigation Unit in December 2016. After follow-up inspections, it was noted by Jodale Legg of the Mitigation Unit (via email 9/28/17) that the project would be closed out without any further maintenance or monitoring.

2018 Remedial Activity

The recent remediation project consisted of excavating approximately 24 “hotspot” areas of soils impacted with volatile organic compounds (VOCs) and metals, specifically lead, arsenic, chromium and nickel. Eight (8) of the 24 hotspots were located in the near vicinity or within wetland transition areas, formally remedied and restored.

A plan was formulated and submitted to NJDEP on January 3, 2018 to summarize and calculate the proposed excavation areas. Approval for this work was received via letter from NJDEP on February 12, 2018 (Appendix C). The following table provides a summary of the final disturbed and restored areas within the wetlands transition area.

Estimated Wetland Transition Area Disturbance		
Group ID	Acres	Ft²
Group A	0.014	610.9
Group B	0.058	2,558.3

All impacted soils were loaded directly into a truck and transported offsite to an approved facility for disposal. Grade was restored in the excavated areas with certified clean fill and subsequently reseeded with vegetation of equal or greater ecological value. No trees were removed for the additional remediation activities; however one fell tree was removed from the excavation area for safety precautions, leaving only the stump behind.

Mitigation Activities

Excavation of the hotspots took place in March 2018 (Appendix D). Following removal of impacted soils, the excavation areas were restored to original grade with certified clean fill.

All areas highlighted in the As-built Plan were not subject to restoration. Much of the excavation areas were found within previously disturbed areas. The following were areas that were restored in accordance with the NJDEP approvals:

- Approximately 161 SF in the vicinity of B17, B18, & B19, and
- Approximately 3,008 SF in the southern end of the site.

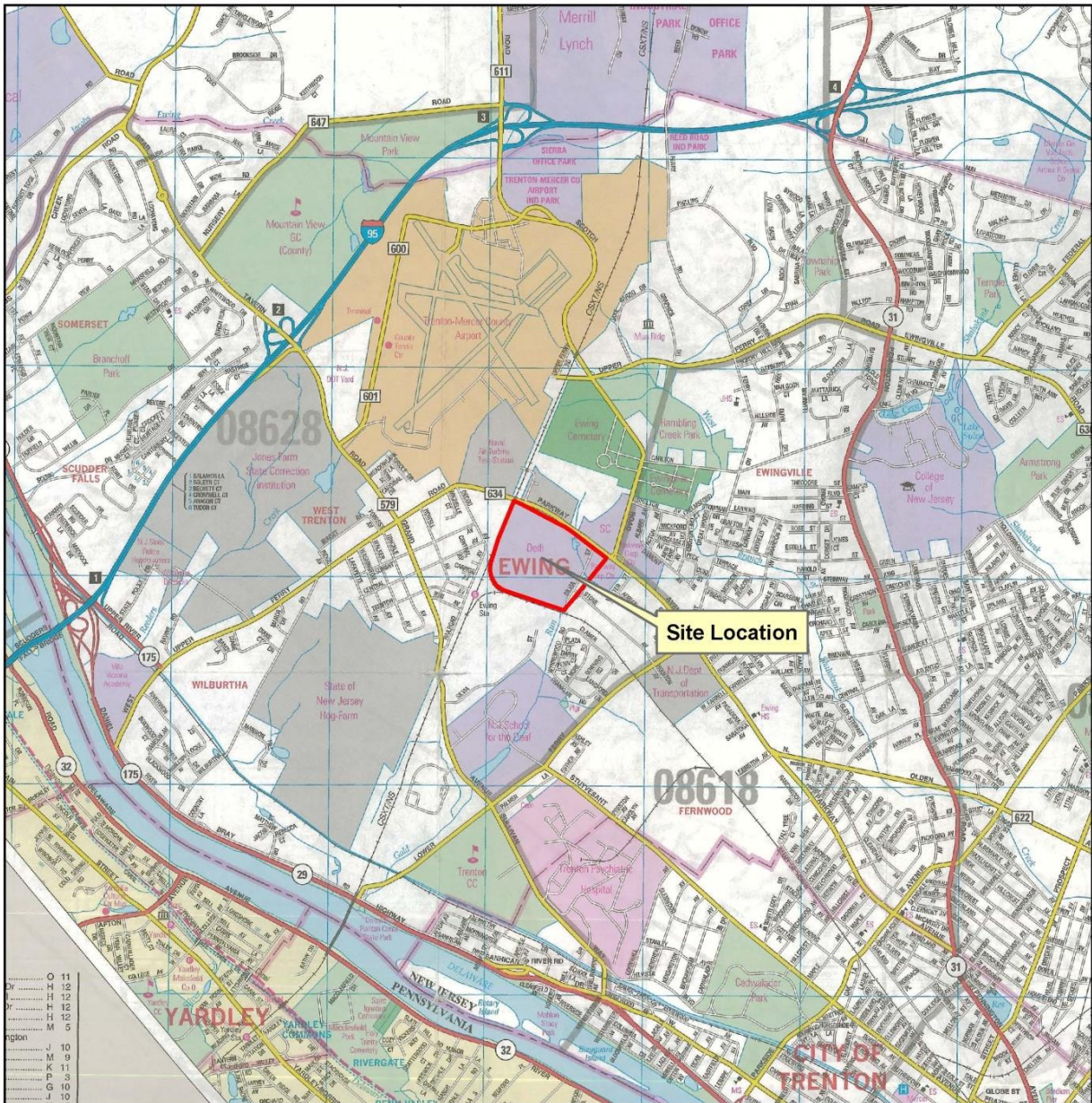
As part of the restoration of these areas, topsoil was placed at a depth of six (6) inches to provide suitable growing media for native plants. Topsoil specifications will follow the parameters of the original mitigation plan and permit requirements. Following topsoil application, the areas were seeded with a Native Riparian Zone Mix, consisting of warm season grasses and wildflowers suitable for establishing in the area. Seeding of the areas took place in May 2018 (Appendix D). Seed was applied with a broadcast spreader and then raked into the soil to ensure proper seed to soil contact.

A follow-up site inspection was conducted in March 2019 to document proper establishment (Appendix D). While much of the coverage consisted of cover crops such as oats, winter rye and annual rye, other species present in the design seed mix were documented throughout the restored areas. Native species present included switchgrass (*Panicum virgatum*), Virginia wildrye (*Elymus virginicus*), indiagrass (*Sorghastrum nutans*). Species such as barnyard grass (*Echinochloa crus-galli*) and yellow nutsedge (*Cyperus esculentus*) were also established in the restoration areas.

APPENDIX A

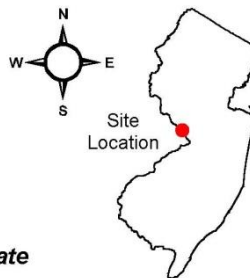
Figures

- County Road Map
- USGS Topographic Map



Legend

 Site Location



Note: Map scale is approximate

Sources:
Mercer County New Jersey Street Map published by Hagstrom Map Company, Inc., Maspeth, New York, 2004.

Figure 1
Regional Location Map

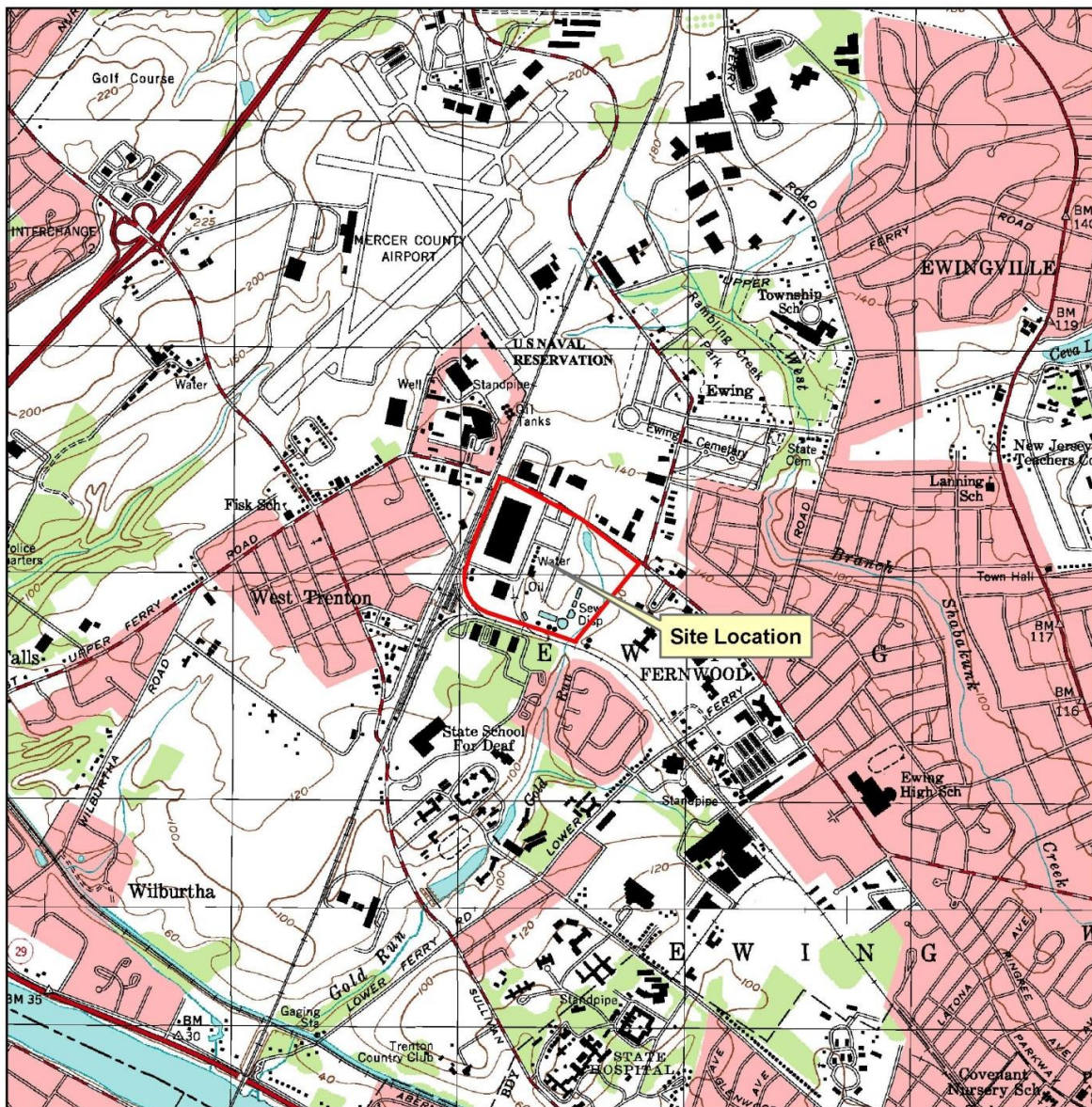
Former Delphi / Trenton Facility
Block 343; Lot 1
Ewing Township
Mercer County, New Jersey

ASGECI Proposal # 2549A

3,000

Feet

 **AMY S. GREENE**
ENVIRONMENTAL
CONSULTANTS.



Legend

 Site Location

New Jersey State Plane Coordinates in
NAD83 for the approximate center of site -
North: 521,116' // East: 406,298'

Latitude and Longitude Coordinates in
NAD83 for approximate center of site -
N: 40° 15' 49.3" / W: 74° 48' 27.2"

Sources:
Collarless / Seamless Bit-Mapped 7.5 Minute Color Topographic Images of New Jersey, United States Geological
Survey (USGS), Digital Raster Graphic (DRG) Topographic Series Map, Pennington NJ/PA and Trenton West PA/NJ
Quadrangles, USGS, Reston, Va., January 9, 1996, distributed by Digital Data Services, Inc., Lakewood, CO.

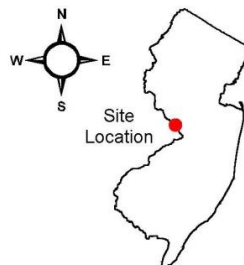
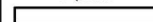


Figure 2
Site Location Map

Former Delphi / Trenton Facility
Block 343; Lot 1
Ewing Township
Mercer County, New Jersey

ASGECI Proposal # 2549A

2,000



Feet

 **AMY S. GREENE**
ENVIRONMENTAL
CONSULTANTS

APPENDIX B

As-Built Plan



**HALEY
ALDRICH**

EWING TOWNSHIP INDUSTRIAL LAND
EWING, NEW JERSEY

SITE PLAN

APRIL 2018

FIGURE 2

APPENDIX C

Agency Correspondence



State of New Jersey

PHILIP D. MURPHY
Governor

SHEILA Y. OLIVER
Lt. Governor

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Division of Land Use Regulation
Mail Code 501-02A
P.O. Box 420
Trenton, New Jersey 08625-0420
www.nj.gov/dep/landuse

CATHERINE R. McCABE
Acting Commissioner

February 12, 2018

Mr. Craig P. Metzgar
Amy S. Greene Environmental Consultants, Inc.
4 Walter Foran Blvd.
Suite 209
Flemington, NJ 08822

Re: File#1102-06-0001.1 FHA/FWW110001
GM Delphi/RACER Trust Remedial Site
Block 343; Lot 1
Ewing Township, Mercer County

Dear Mr. Metzgar:

This is in response to your letter of January 3, 2018 that outlines additional, limited, remedial activities that are needed at the above project site. In September 2017, the Department signed off on the successful restoration of the areas of wetlands, open waters and riparian zones affected by the cleanup at the site. In your letter, you indicate that some of those areas require additional cleanup and restoration.

Because the nature of the activities is the same as those activities previously conducted, by way of this letter, the Department acknowledges that work will continue in these regulated areas followed by additional restoration activities and is hereby approving the activities described in your January 3, 2018 letter. The following conditions shall apply to the areas to be restored after completion of the cleanup activities described in your letter:

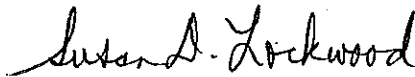
1. In accordance with N.J.A.C. 7:7A-11.12(e), within 60 days following the final planting of the restoration areas, the permittee shall submit a Construction Completion Report to the Division detailing as-built conditions (see below) and any changes to the approved restoration plan that were made during construction. The Construction Completion Report shall contain, at a minimum, the following information:
 - a. A completed Wetland Mitigation Project Completion of Construction Form. This form is located on the Internet at <http://www.nj.gov/dep/landuse/forms/index.html> and certifies that the mitigation project has been constructed as designed and that the proposed area of wetland creation, restoration or enhancement has been accomplished;

- b. As-Built plans which depict final grade elevations at one-foot contours and include a table of the species and quantities of vegetation that were planted including any grasses that may have been used for soil stabilization purposes;
 - c. Photos of the constructed wetland mitigation project with a photo location map as well as the GPS waypoints in NJ state plane coordinates NAD 1983; and
 - d. An explanation for any deviation from the approved mitigation proposal.
2. In accordance with N.J.A.C. 7:7A-11.12(f), the permittee shall monitor the mitigation project for 5 years after completion of construction. The Department may modify the duration of required monitoring if it determines that the plantings are established successfully at an earlier date. All monitoring reports must include the standard items identified in the checklists entitled Wetland Mitigation Monitoring Project Checklist. The Wetland Mitigation Monitoring Project Checklist is located on the Internet at <http://www.nj.gov/dep/landuse/forms/index.html>.
3. Once the required monitoring period has expired and the permittee has submitted the final monitoring report, the Division will make the finding that the mitigation project is either a success or a failure. This mitigation project will be considered successful if the permittee demonstrates all of the following:
 - a. That the goals of the wetland mitigation project including acreage and the required transition area, as stated in the approved wetland mitigation proposal and the permit, has been satisfied. The permittee must submit a field wetland delineation of the wetland mitigation project based on the Federal Manual for Identifying and Delineating Jurisdictional Wetlands (1989) which shows the exact acreage of State open waters, emergent, scrub/shrub and/or forested wetlands in the mitigation area;
 - b. The site has an 85 percent survival and 85 percent area coverage of the mitigation plantings or target hydrophytes which are species native to the area and similar to ones identified on the mitigation planting plan. All plant species in the mitigation area are healthy and thriving. All trees are at least five feet in height;
 - c. The final monitoring report must include documentation demonstrating the site is less than 10 percent occupied by invasive or noxious species.
 - d. The site contains hydric soils or there is evidence of reduction occurring in the soil; and,
 - e. The proposed hydrologic regime as specified in the mitigation proposal has been satisfied. This criteria must be satisfied to prove the mitigation site is a wetland.
4. In accordance with N.J.A.C. 7:7A-15.16(f) the permittee shall assume all liability for accomplishing corrective work should the Division determine that the compensatory mitigation has not been 100 percent successful. If the mitigation project is considered a failure, the permittee is required to submit a revised mitigation plan in order to meet the success criteria identified above. The plan shall be submitted within 30 days of receipt of the letter from the Division indicating the wetland mitigation project was a failure. The financial surety, if required, will not be released by the Division until such time that the permittee satisfies the success criteria as stipulated above.

5. As per N.J.A.C. 7:7A-15.3(b), if the permittee fails to perform mitigation within the applicable time period the acreage of mitigation required shall be increased by 20 percent each year after the date mitigation was to begin.

If you have any questions regarding this letter, please feel free to contact me at Susan.Lockwood@dep.nj.gov or at (609)984-0580.

Sincerely,

A handwritten signature in cursive script that reads "Susan D. Lockwood".

Susan D. Lockwood
Supervisor
Mitigation Unit

APPENDIX D

Site Photographs



Photo A- View north of the restoration area in the vicinity of B17, B18 & B19 showing restored topsoil and preparation for native seeding. Note the removal of the felled tree for safety reasons. (May 2018)



Photo B- View north of the restored area in the vicinity of B17, B18 & B19 containing established grasses such as oats, swithgrass, annual rye, and Virginia wildrye.



Photo C- View south of area B-21 showing the restoration area containing proper topsoil and prepared for seeding.



Photo D- View south of the restored area around B21 containing established grasses such as oats, swithgrass, annual rye, and Virginia wildrye. Phragmites from surrounding areas have come back into this area.