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Clayton
ENVIRONMENTAL
CONSULTANTS

November 4, 1997

Mr. Larry Edelstein
Harry Stadler, Esq.
RIVENDELL TERRACE, L.L.C.
90 Woodbridge Center Drive, Suite 600
Woodbridge, New Jersey 07095

Clayton Project No. 40-98186.00

Subject: Phase I and Limited Phase II Environmental Site Assessment Report of Three Parcels within the Former Camp Kilmer Military Base Located on Truman Drive in the Townships of Edison and Piscataway, New Jersey

Transmitted Via: Facsimile (732) 985-4083

Dear Messrs. Edelstein and Stadler:

Clayton Environmental Consultants, Inc. (Clayton) is pleased to present its Phase I and Limited Phase II Environmental Site Assessment (ESA and assessment) report of two parcels within the former Camp Kilmer Military Base, comprised of approximately 35 acres, and located adjacent to Kilmer Road, Truman Drive, Ethel Road, and Stelton Road/Plainfield Avenue in Edison and Piscataway, New Jersey (subject property). The Phase I ESA was conducted in accordance with the scope and limitations of the American Society of Testing and Materials (ASTM) Standard Practice E 1527-97. The objective of the assessment was to provide an independent, professional opinion regarding *recognized environmental conditions* (as defined by ASTM), if any, associated with the subject property. In addition, Clayton performed a Limited Phase II ESA in areas of potential environmental concern observed during the Phase I ESA. The Phase II ESA was limited to the areas assessed by Clayton.

Clayton identified the following *recognized environmental conditions* as defined by ASTM in connection with the subject property:

- Several labeled and unlabeled 55-gallon drums were identified on the subject property during the Phase I ESA including one that was observed to be leaking; a second that was full, factory sealed, and was labeled as containing anti-freeze; and a third that was three-fourths full with an open cover. The subject property also contained several smaller containers, including 5-gallon containers labeled Stolite-1, two cans of engine degreaser, and a 5-gallon drum of roofing tile cement. Clayton assessed and sampled unknown materials from the drums and

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sampled impacted soils adjacent to the leaking drum during the subsequent Phase II ESA conducted on October 17, 22, 27, and 28, 1997. The sampling was conducted for waste classification to determine proper disposal methods for unknown materials and to assess potential impact to surface soils.

- Several areas of what appeared to be paint and varnish staining were located at the northwest corner of the subject property. The staining was present on the asphalt road as well as in the grass. Clayton sampled both surface and subsurface soils [to a depth of four feet below ground surface (bgs)] associated with the soil staining during its Phase II ESA of the subject property.
- ★ • Two sump pits were identified on the subject property, both of which contained a liquid substance. No odor was detected from the sump pit (Sump 1 containing approximately 15 cubic feet of liquid) in Building #1510; however, the sump pit in the metal shed (Sump 2, located at the former gasoline filling station, containing approximately nine cubic feet of liquid) emitted a strong petroleum odor. Clayton sampled the liquids from the sumps during its Phase II ESA. The sampling was conducted for waste classification to determine proper disposal methods.
- Two vent pipes and filled excavations with adjacent soil piles, evidence of existing or removed underground storage tanks (USTs), were observed near Building #665, Building #1510, and Building #722. Clayton suspected that USTs associated with the other three structures on the subject property may exist or may have existed at one time, although evidence leading to this suspicion was not specifically identified. Clayton utilized both non-intrusive, geophysical survey techniques and drilling methods during the Phase II ESA to assess the following: (1) the potential for USTs existing on the subject property, and (2) the possibility of contamination associated with any identified USTs or UST excavations.
- Three aboveground storage tanks (ASTs) were identified on the subject property including the following: (1) a plastic AST containing approximately 32 cubic feet of liquid chlorine; (2) an AST containing approximately two cubic feet of a petroleum-type substance; and (3) an unsealed and empty hot-tar AST.
- Potential polychlorinated biphenyl (PCB)-containing equipment was observed on the subject property, including a hydraulic lift, light ballasts, and transformers. The transformers consisted of one pole-mounted transformer

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and six transformers on stands approximately fifteen feet high. The subject property also contained what appeared to be a transformer pad that had its transformer removed. According to Mr. Patrick Hohn, Maintenance Manager with Edison Job Corps, and Mr. Barry Shafer, Senior Vice President with Germinsky Electrical, the transformers are owned by the federal government and serviced by Germinsky Electrical. According to Mr. Hohn, the transformers were assessed and found to be non-PCB containing.

Clayton identified the following non-ASTM conditions in connection with the subject property:

- Suspected asbestos-containing materials (SACM) were identified in the buildings on the subject property including wall insulation, floor tile, spray-on insulation, thermal systems insulation (TSI), drywall, roofing, and ceiling materials. These materials were sampled during the Phase II ESA to determine possible asbestos content.

Clayton recommends the following in connection with the subject property:

- The drums located on the subject property should be removed for proper disposal (based on the sampling results and subsequent waste profile) in accordance with federal and state regulations. Clayton estimates the cost for the disposal of the drums and smaller containers to range from \$5,000 to \$8,000 and take approximately three weeks to complete.

Soil samples collected adjacent to the leaking drum did not exceed New Jersey Department of Environmental Protection (NJDEP) Soil Cleanup Criteria; therefore, no further action is recommended.

- The soils located near the paint and varnish staining area were found to contain levels in excess of NJDEP Soil Cleanup Criteria. The impacted soils should be excavated (to a depth of approximately four feet bgs) and removed from the subject property by a licensed waste hauler and disposed at a certified Treatment, Storage, and Disposal (TSD) facility. Five closure samples should be collected from the excavation prior to its closure with certified clean-fill. Clayton estimates the cost for these activities to range from \$8,000 to \$10,000 and take approximately two weeks to complete.

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- The contents of the two sump pits should be transferred into steel 55-gallon drums, grouped with the previously mentioned drums, and removed from the subject property for proper disposal (based on the sampling results and subsequent waste profile) in accordance with federal and state regulations. Clayton estimates the cost for these activities (if conducted with the removal of the previously mentioned drums) to be \$1,000 and take approximately three weeks to complete.
- No USTs (associated with the building structures) were identified as a result of non-intrusive, geophysical survey techniques. However, drilling activities conducted during the Phase II identified at least four potential UST excavations, indicating that USTs may have existed on the subject property at some time in the past. The excavations were identified due to the presence of non-native fill material and the presence of soils and groundwater exhibiting nuisance characteristics attributable to petroleum-type contamination. This was further confirmed by the presence of petroleum-type constituents (identified during the analysis of collected soil samples) in soils at the bottom of the excavations. However, the constituents detected in the soils did not exceed NJDEP Soil Cleanup Criteria; therefore, no further action is recommended.
- The contents of the plastic AST and the steel AST in the metal shed should be transferred into plastic and steel 55-gallon drums, respectively. They should be grouped with the previously mentioned drums and removed from the subject property for proper disposal in accordance with federal and state regulations. Clayton estimates the cost for these activities (if conducted with the removal of the previously mentioned drums) to be \$1,500 to 2,000 and take approximately three weeks to complete.
- Arrangements should be made with the subject property owner for the disposal of the transformers located on the subject property. Responsibility for the proper testing and disposal of the transformers should be held by the owner. The estimate cost to remove and dispose of non-PCB containing transformers will range from \$10,000 to \$15,000 and will take four weeks to complete. Replacement costs are not included in this estimate.

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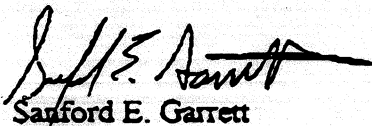
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- Asbestos-containing materials in the form of floor tile and TSI were identified in Buildings #1540, #722, and #1510. Prior to activities (e.g., renovation and/or demolition of the buildings) which may damage or disturb the material, the asbestos-containing materials must be removed. The building owner must comply with applicable United States Environmental Protection Agency (USEPA) National Emissions Standards for Hazardous Air Pollutants (NESHAPS) and local regulations. Clayton estimates the cost for the removal of the identified asbestos-containing materials to range from \$13,000 to \$19,000 and take approximately three weeks to complete. We are aware that Rivendell Terrace, L.L.C. will assume the cost to remediate the asbestos containing materials found at the subject property.

Clayton estimates that the total cost for the above-specified recommendations will be between \$38,500 and \$55,000.

We appreciate this opportunity to provide our services to Rivendell Terrace, L.L.C. If you have any questions, please call me at (732) 225-6040.

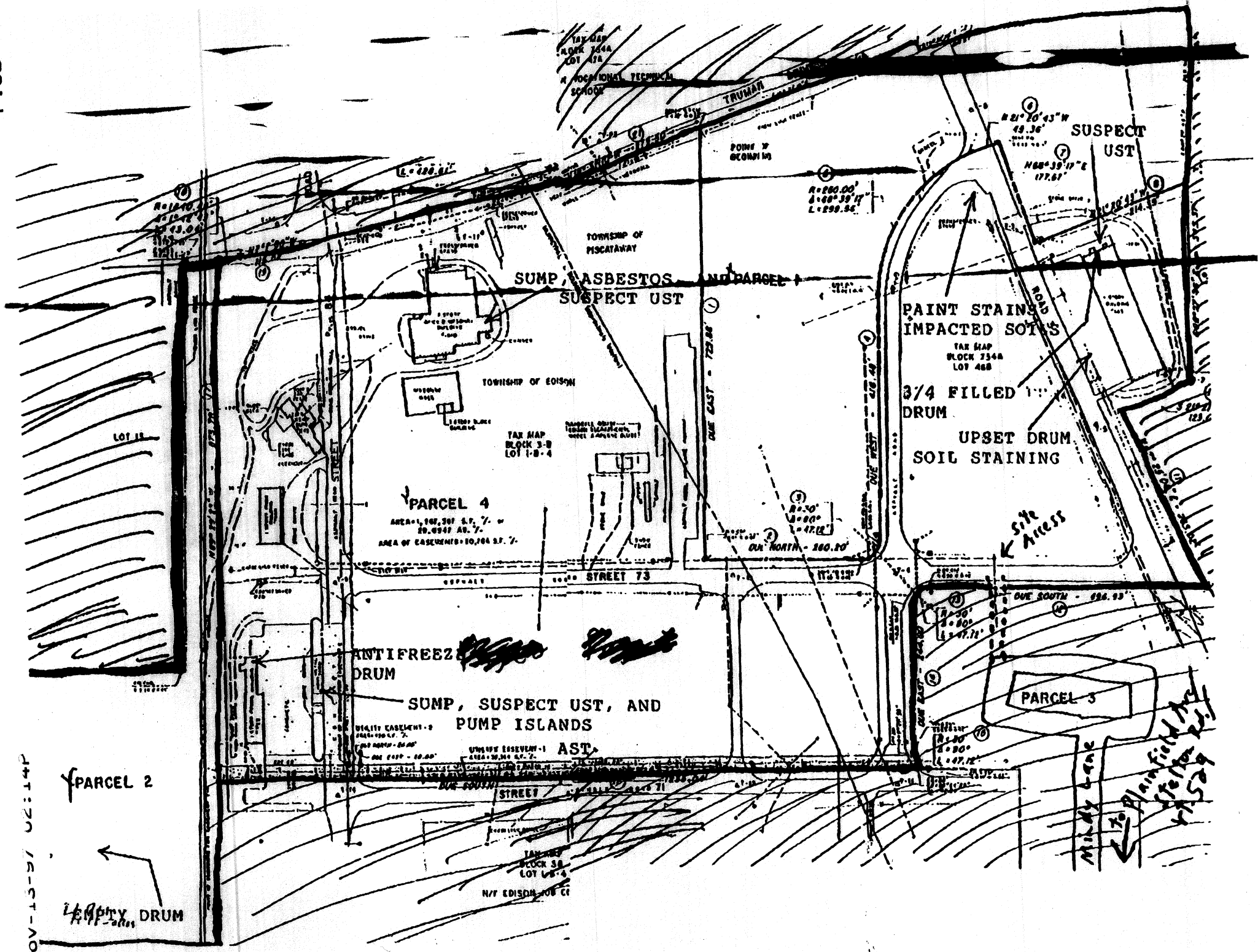
Sincerely,



Sanford E. Garrett

Director

Environmental Management and Remediation
New York Regional Office



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EMPTY DRUM

MILKY GENE
To Plainfield