

February 4, 2021

Via UPS Ground

Township of West Orange
Zoning Board of Adjustment
66 Main Street, Room 214
West Orange, NJ 07052

Attn: Sean McCauley, Planning Board Secretary

**RE: LIMITED ENVIRONMENTAL IMPACT STATEMENT
SELECTO FLASH MIXED-USE BUILDING
8 -10, 18 CENTRAL AVENUE - BLOCK 9, LOTS 32 & 36
WEST ORANGE, ESSEX COUNTY, NEW JERSEY
MATRIX NO. LD19-153**

Mr. McCauley:

This limited environmental impact statement has been prepared in support of a site plan application for the above-mentioned project. In accordance with Section 25-13.2b of the Land Use Ordinance, a pre-application conference call was held between Matrix New World Engineering (Matrix) and Paul Grygiel (Philips Preiss, LLC). The subject property is located within the Central Valley Redevelopment Area, was previously developed, and is currently undergoing environmental remediation as discussed in more detail below. The applicant is proposing to construct a five-story mixed-use development which will contain 94 residential units and 3,500 sf of retail space. As discussed during the pre-application phone call, it was determined that a limited environmental impact statement would be sufficient and that the EIS should focus on the environmental remediation work as well as the Flood Hazard Area permitting.

ENVIRONMENTAL REMEDIATION

Beginning in the 1980's, SelectoFlash (Block 9, Lot 32) owned and operated a silk-screening business, using solvent-based inks to produce large-scale decals. Historical soil data has indicated the presence of trichloroethene (TCE) and other chlorinated volatile organic contaminants (CVOCs) at the Site. TCE has also been consistently detected in groundwater samples collected from on-site monitoring wells. The results of historic subsurface investigation activities have also indicated the presence of a CVOC source at the adjacent Biddelman property (Block 9, Lot 36). Biddelman, Inc. operated as a wholesale distributor of dry-cleaning supplies including tetrachloroethene (PCE) which was stored in a 4,000-gallon above-ground storage tank (AST). Biddelman ceased operations in 1987, the PCE tank was removed with a fuel oil underground storage tank (UST) in 1987, and the Site has been vacant since 2004.

The Biddelman and SelectoFlash Sites are also both included within the Orange Valley Regional Groundwater Contamination Site (Comprehensive Environmental Response, Compensation and Liability Act [CERCLA] ID No. NJD002148799 [formerly known as the West Orange Groundwater Contamination Site]), which consists of a groundwater contaminant plume that cannot be clearly attributed to any specific source. The Biddelman and SelectoFlash Sites are associated with F-listed wastes that may be the source, or one of the sources, of the groundwater contamination.

SelectoFlash Block 9, Lot 32

The Township received funding under the NJDEP's Hazardous Discharge Site Remediation Fund (HDSRF) grant program to complete a Preliminary Assessment (PA) and Site Investigation (SI) at the Site to evaluate the environmental conditions. The PA Report was submitted to the NJDEP on February 23, 2018 and the SI Report was submitted to the NJDEP on March 2, 2018, identifying a total of twenty-four (24) areas of concern (AOC). Additional HDSRF grant funds were awarded for the completion of a RI and RAW in 2018 and 2019. Environmental investigations completed at the Site have identified the presence of contaminants, including CVOCs, semi-volatile organic compounds (SVOCs), and metals in soil at concentrations exceeding the NJDEP's Residential or Non-Residential Direct Contact Soil Remediation Standards (RDSCRS or NRDCRS), the Default Impact to Groundwater Soil Screening Levels (IGWSSL). Furthermore, CVOCs, and SVOCs were detected in groundwater at concentrations above the NJDEP's Groundwater Quality Standards (GWQS).

As part of the RI activities conducted on-Site between January 2019 and December 2019, horizontal and vertical delineation of CVOC exceedances of RDSCRS and NRDCRS was achieved in all directions. In addition, soil texture analysis was completed for use in the Seasonal Soil Compartment Model (SESOIL) Model to develop a Site-Specific Impact to Groundwater Soil Remediation Standard (SSIGWSRS) for cis 1,2-DCE, PCE, and TCE. The RI for groundwater included the established of a Classification Exception Area (CEA) for the SelectoFlash portion of the contaminant plume. Finally, based on the results of the 2019 groundwater sampling, Vapor Intrusion (VI) sampling was required at three occupied structures within 100 feet of CVOC contamination above NJDEP Vapor Intrusion Groundwater Screening Levels (GWSL). These three occupied structures were sampled, and a completed VI pathway does not exist. The RI Report was submitted to the NJDEP on February 28, 2020.

The planned RA includes the removal of an 10,000-gallon Underground Storage Tank (UST), the removal of impacted soils in several AOCs with post remedial groundwater monitoring, and the use of engineering (i.e. capping) and institutional controls (i.e. Deed Notice and CEA) for residual impacts and historic fill material. After the completion of the RA and redevelopment of the Site, a Deed Notice will be prepared and filed with the County Clerk of Essex County. A copy of the filed Deed Notice will be included with an application for a Remedial Action Permit for Soils (RAP-soils) as part of the RA Report. Should contamination remain in groundwater after post-remedial monitoring is completed, the groundwater CEA will be re-evaluated and modified as necessary, with detail included in an application for a Remedial Action Permit for Groundwater (RAP-Groundwater). Upon approval of the RAPs, a Restricted Use Response Action Outcome (RAO) for the Site will be issued by the Licensed Site Remediation Professional (LSRP).

The HDSRF Grant for the removal of the UST has been approved by NJDEP and EDA. The HDSRF Grant Application for the remainder of the RA activities was submitted to NJDEP Office of Brownfield & Community Revitalization (OBCR) in April 2020. All remedial action activities will be implemented upon the approval of the HDSRF Grant for remedial action at the neighboring Biddelman Site (the remediation of both sites will be completed concurrently).

Biddelman Block 9, Lot 36

The Township of West Orange received funding under NJDEP's Site Remediation Program HDSRF grant program to complete a PA/SIR which was submitted to NJDEP in April 2020 and identified 17 potential AOCs. As a result of the SI activities, a Remedial Investigation Workplan (RIW) was prepared in August 2020 recommending additional investigation to delineate CVOC soil impacts, CVOC groundwater impacts, and to determine if any additional AOCs are impacting the soils or groundwater beneath the Site. As part of the proposed RIW, the SESOIL Model will be used to develop a SSIGWSRS for key Contaminants of Concern (COCs), specifically PCE and TCE. The RIW for Biddelman groundwater also includes the installation of hydropunch borings and additional monitoring wells and the establishment of a CEA for the

Biddelman portion of the commingled groundwater plume. The RIW for vapor intrusion includes the completion vapor intrusion investigations at five off-site properties.

The August 2020 RIW formed the basis for an Application for an HDSRF Grant to complete the remedial investigation, the RIR, and the RAW for the Biddelman Site. The HDSRF Grant Application was forwarded to OBCR on August 17, 2020 and was approved for referral to the Economic Development Authority (EDA) on January 22, 2021.

When completed, the RAW is expected to include plans for the removal of impacted soils with post remedial groundwater monitoring and the use of engineering (i.e. capping) and institutional controls (i.e. Deed Notice and CEA) for residual impacts and historic fill material. As with the SelectoFlash Site, a Deed Notice will be prepared for the Biddelman Site after the completion of the RA which will be filed with the County Clerk of Essex County. A copy of the filed Deed Notice will be included with an application for a RAP-soils as part of the RA Report. Should contamination remain in groundwater after post-remedial monitoring is completed, the groundwater CEA will be re-evaluated and modified as necessary, with detail included in an application for a RAP-Groundwater. Upon approval of the RAPs, a Restricted Use RAO for the Site will be issued by the LSRP.

FLOOD HAZARD AREA PERMITTING

Background

The site is in the fluvial flood hazard area of the East Fork of the East Branch Rahway River which is located approximately 200 feet to the east of the site. The section of that waterbody between Central Avenue and Mitchell Street had been historically culverted. However, on September 22, 2016 the NJDEP issued a flood hazard area verification and individual permit for the construction of two residential buildings and a commercial parking garage on the property adjacent to the subject property on the east. As part of that approval the culvert was removed and the stream channel was re-established. The NJDEP permit verifies that the width of the riparian zone associated with the waterbody is 50-feet, that the floodway limits were within the limits of the restored channel, and that the flood hazard area design flood elevation (FHADFE) ranged from elevation 174.98 to 175.38.

Based upon the above verification, no portion of the subject site is in a riparian zone or a floodway. Most of the site is located in the flood fringe of the East Fork of the East Branch Rahway River.

Proposed Activities

In addition to the proposed 5-story building it is also proposed to construct 133 surface parking spaces and utility infrastructure. Access to the site will be via Central Avenue and Mitchell Street. The first floor of the building will contain commercial space along Central Avenue and residential units extending from Central Avenue towards Mitchell Street along the boundary with lot 44. A portion of the building will be elevated on pilings to allow for flood storage volume beneath the building. Based upon the proposed improvements, Matrix is submitting to the NJDEP an application for a Flood Hazard Area Individual Permit.

In accordance with the flood hazard area (FHA) regulations the lowest floor elevation of the residential component of the building will be 179.0 which is more than one foot above the maximum flood hazard area design flood elevation (FHADFE) of 175.38. The lowest floor elevation of the commercial component will range from 173.44 to 179.0. Portions of the building below the FHADFE will be flood proofed.

As previously mentioned, the site is located within a fluvial flood hazard area and therefore the proposed development cannot result in any loss in available on-site flood storage volume. In order to comply with this requirement, a portion of the building will be elevated allowing flood waters to flow under this portion of the building and this offsets any loss of flood volume elsewhere on the site due to the proposed

development. Another requirement of the FHA regulations is that parking should be 1-foot above the flood elevation to the greatest extent practical. In the proposed development, the Central Avenue entrance, and portions of the parking lot to the west and rear of the building may be subject to flooding of less than 1 foot. The parking area in the southern portion of the site and the exit drive to Mitchell Street are at or above the flood elevation. In existing conditions, both Central Avenue and Mitchell Street are generally below the flood elevation adjacent to the site. It is worth noting that as vehicles exit the site onto Mitchell Street and turn right the elevation of the street very quickly reaches 1 foot above the flood elevation providing a safe means of egress from the site for vehicles. In accordance with NJDEP regulations, the portions of the parking areas located less than 1 foot above the flood elevation will have signage indicating that the area is subject to flooding.

The proposed development contains two underground stormwater detention systems which are designed utilizing oversized pipes and outlet structures to attenuate runoff leaving the site. These detention systems are designed to reduce the total site post-development peak flow rates to less than or equal to 50%, 75%, and 80% of the total site pre-development peak flow rates for the 2-, 10-, and 100-year storm events, respectively. The systems discharge to the existing stormwater systems in Mitchell Street and Central Avenue. Details of the stormwater management system are contained in the Stormwater Management Report submitted separately as part of this application.

If you should have any questions or require additional information, please contact my office at (973) 295-3604 or via email at ssavage@matrixnewworld.com.

Sincerely,



Sean M. Savage, PE, LEED AP
Director of Land Development
License No. 24GE04451000

SMS:lb