

Curtis Specialty Papers Site Milford, New Jersey



REMEDIAL DESIGN/TREATABILITY STUDY FIELD ACTIVITIES
Community Advisory Group Meeting
October 23, 2017

BASIS FOR REMEDIAL DESIGN AND TREATABILITY STUDY FIELD ACTIVITIES

- Record of Decision – September 30, 2015
- Remedial Design and Remedial Action Consent Decree – April 10, 2017
- Remedial Design Work Plan – approved August 30, 2017



RECORD OF DECISION

Selected Groundwater Remedy

Anaerobic Biological Oxidation and Institutional Controls

- Anaerobic biological oxidation – stimulate organisms in the ground to treat volatile organic compounds in groundwater
- Institutional Controls - Classification Exception Area/Well Restriction Area until cleanup complete

REMEDIAL DESIGN WORK PLAN

- Presents each remedial design task and outlines technical activities to complete each task
- Supporting Documents:
 - Treatability Study Work Plan (Appendix A)
 - Quality Assurance Project Plan (Appendix B)
 - Field Sampling Plan (Appendix C)
 - Health and Safety Plan (Appendix D)
 - Including an Emergency Response Plan



SCOPE

- Remedial Design: Refine the understanding of extent of impacts and soil type/conditions within the target treatment areas
- Treatability Study: Refine the design parameters, provide interim treatment within the source area



REMEDIAL DESIGN FIELD ACTIVITIES

- Advance 6 soil borings
- Groundwater grab sampling from each of the soil boring locations
- Install 3 additional groundwater monitoring wells, measure water levels



TREATABILITY STUDY FIELD ACTIVITIES

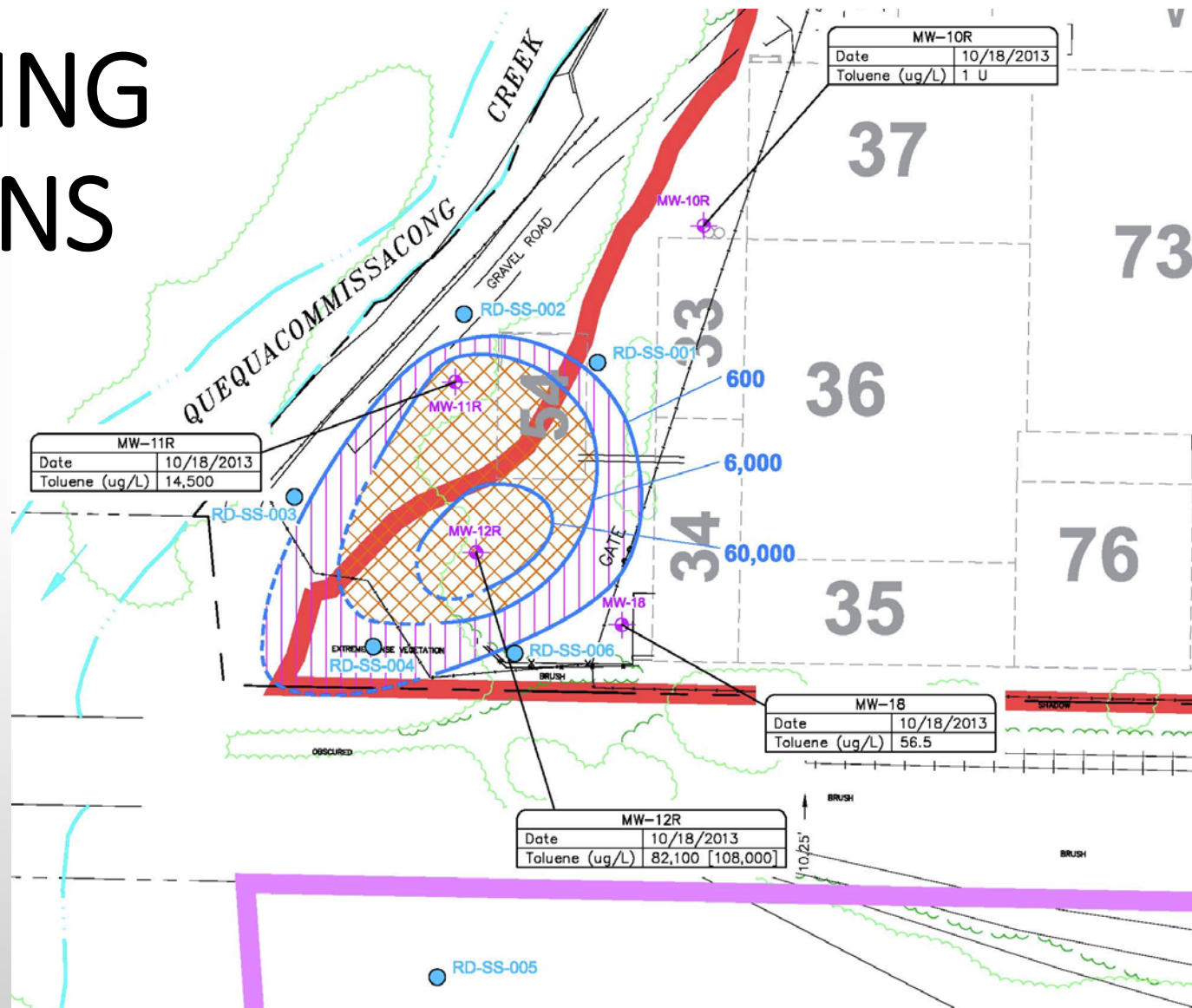
- Install 1 injection well
- Sample groundwater from newly installed and existing CFA monitoring wells
- Implement a single injection event
- Implement three additional quarterly groundwater sampling events



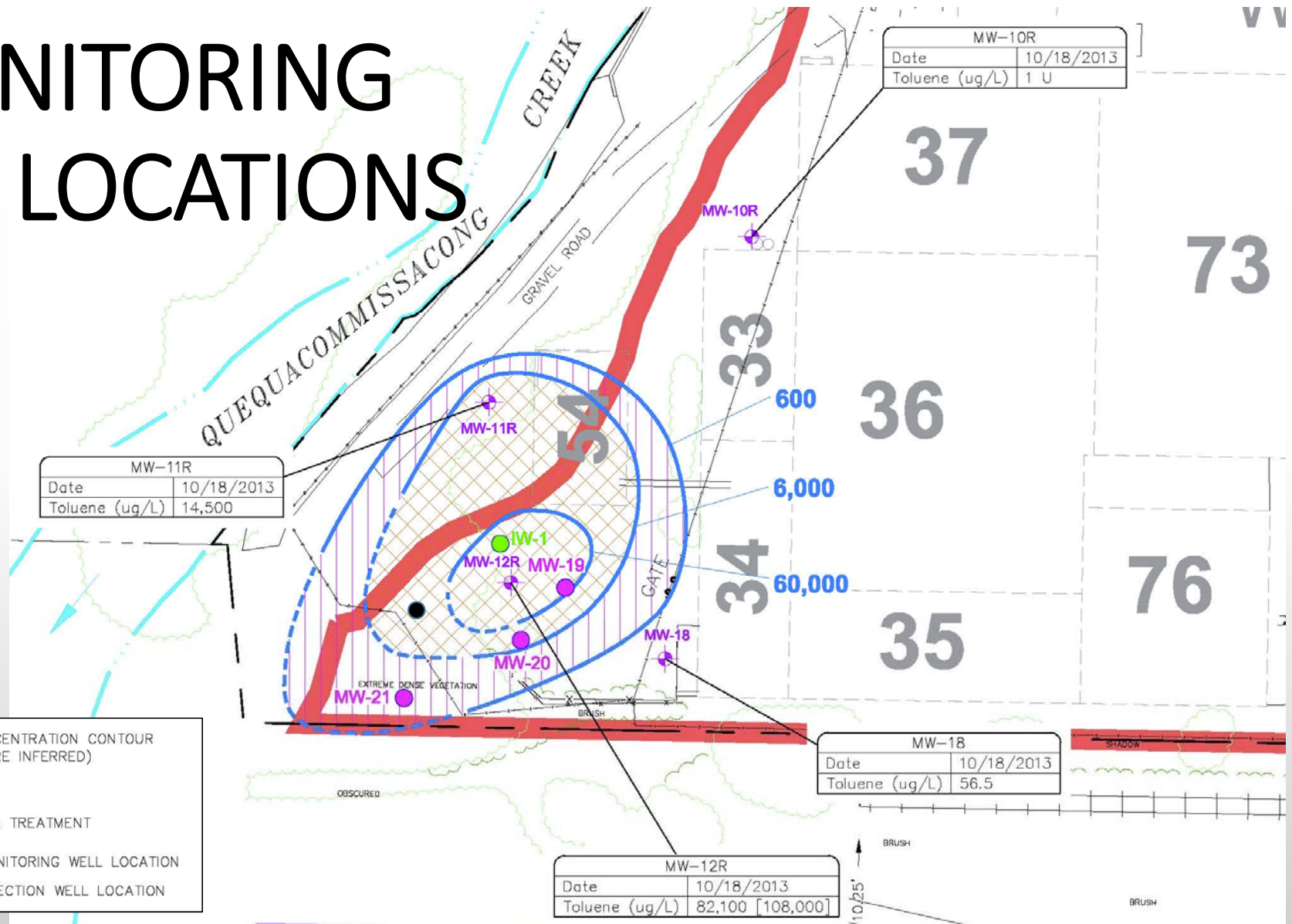
SITE PLAN



SOIL BORING LOCATIONS



MONITORING WELL LOCATIONS



DELIVERABLES

- Treatability Study Evaluation Report
 - Due 30 days following receipt of final validated data from implementation of Treatability Study activities
- Preliminary (30%) Remedial Design
 - Due within 30 days after USEPA provides comments on the Treatability Study Evaluation Report
- Pre-Final (95%) Remedial Design
 - Due within 45 days after USEPA provides comments on the Preliminary (30%) Remedial Design
- Final (100%) Remedial Design
 - Due within 30 days of receiving comments (if any) from USEPA on the Pre-Final (95%) Remedial Design



SCHEDULE

Activity/Submittal	2017			2018				2019			
	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Consent Decree Filing											
Document Submittals	RDWP					TSER	30%	95%	95%	100%	
Agency Reviews/Comments		RDWP					TSER	30%	95%	100%	
Permit/Equivalency Submittals		RD/TS								ABOx	
Permit/Equivalency Approvals			RD/TS								
Field Work			RD/TS	TS	TS	TS					
Construct Remedy											ABOx

COMPLETE

FUTURE DOCUMENT SUBMITTAL

FUTURE AGENCY APPROVAL

FUTURE FIELD WORK

FUTURE REMEDY CONSTRUCTION

QUESTIONS

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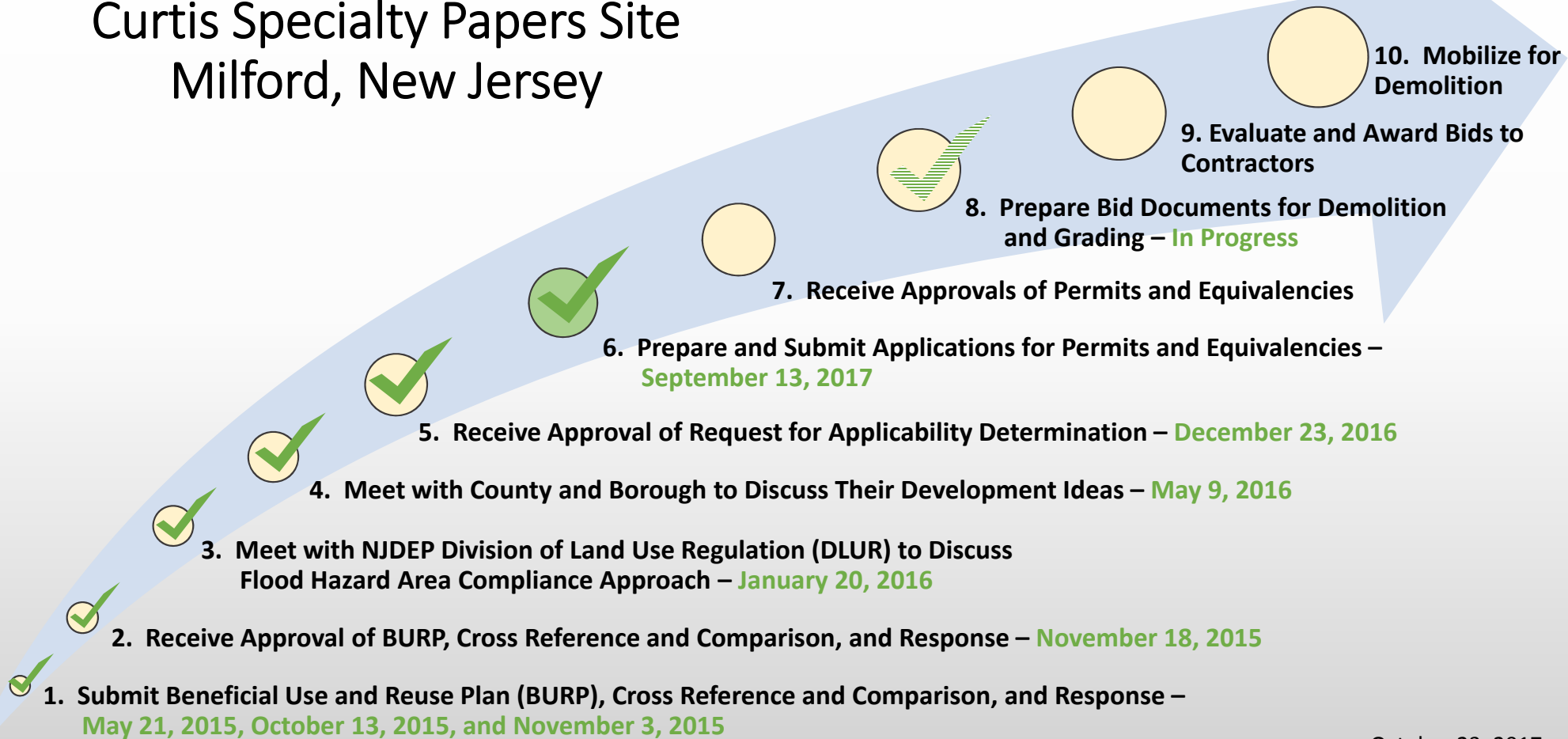
DEMOLITION PERMIT EQUIVALENCY APPLICATION

Community Advisory Group Meeting

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PREPARING FOR DEMOLITION

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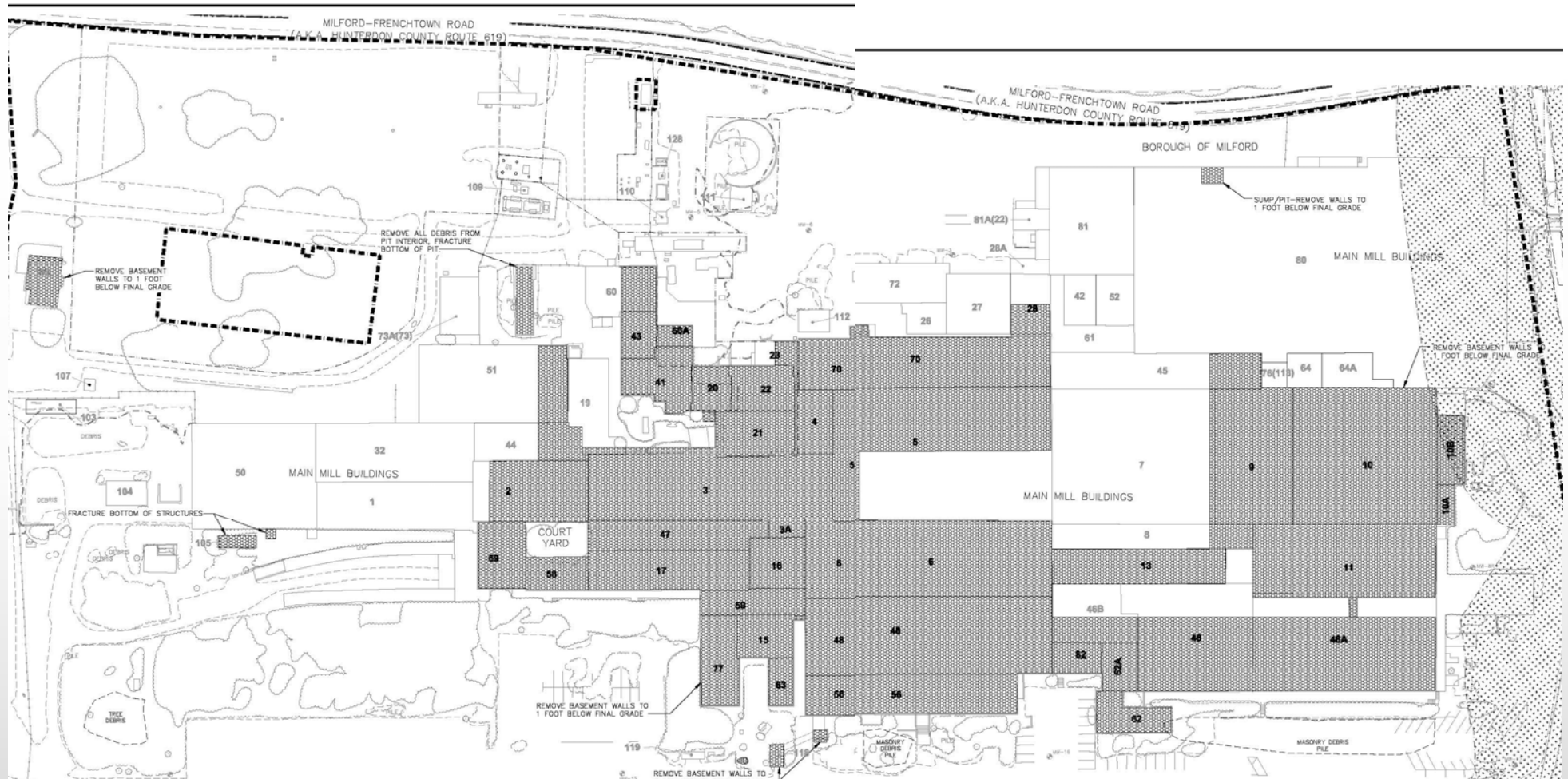


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BENEFICIAL USE AND REUSE PLAN

- Certificate of Authority to Operate a Beneficial Use and Reuse Project Permit Equivalency Application – Demolition (CAO)
- Cross-Reference and Comparison of CAO vs Fill Material Guidance for SRP Sites (Cross-Reference and Comparison)
- Response to Request for Additional Information on the CAO (Response)
- **CAO, Cross Reference and Comparison, Response approved by USEPA and NJDEP on November 18, 2015**





Basement areas shown in gray

REQUEST FOR APPLICABILITY DETERMINATION

- Submitted: December 2, 2016
- Approved: December 23, 2016
- Documents/locks in flood storage volume gain
 - Conditions after building removal, but before any backfilling/grading
 - Credits for past work locked in, provided FHA application showing development submitted within 5 years of demolition of last structure
 - Some of the locked in storage volume will be used by beneficial reuse materials being placed in basements and grading for stormwater management

SITE-WIDE DEMOLITION ACTIVITIES

- Multiple phases
- 1st Phase for majority of mill
 - ✓ Permit equivalency application submitted
- Separate permit equivalency applications for future phases



PHASE I SITE-WIDE DEMOLITION OVERVIEW

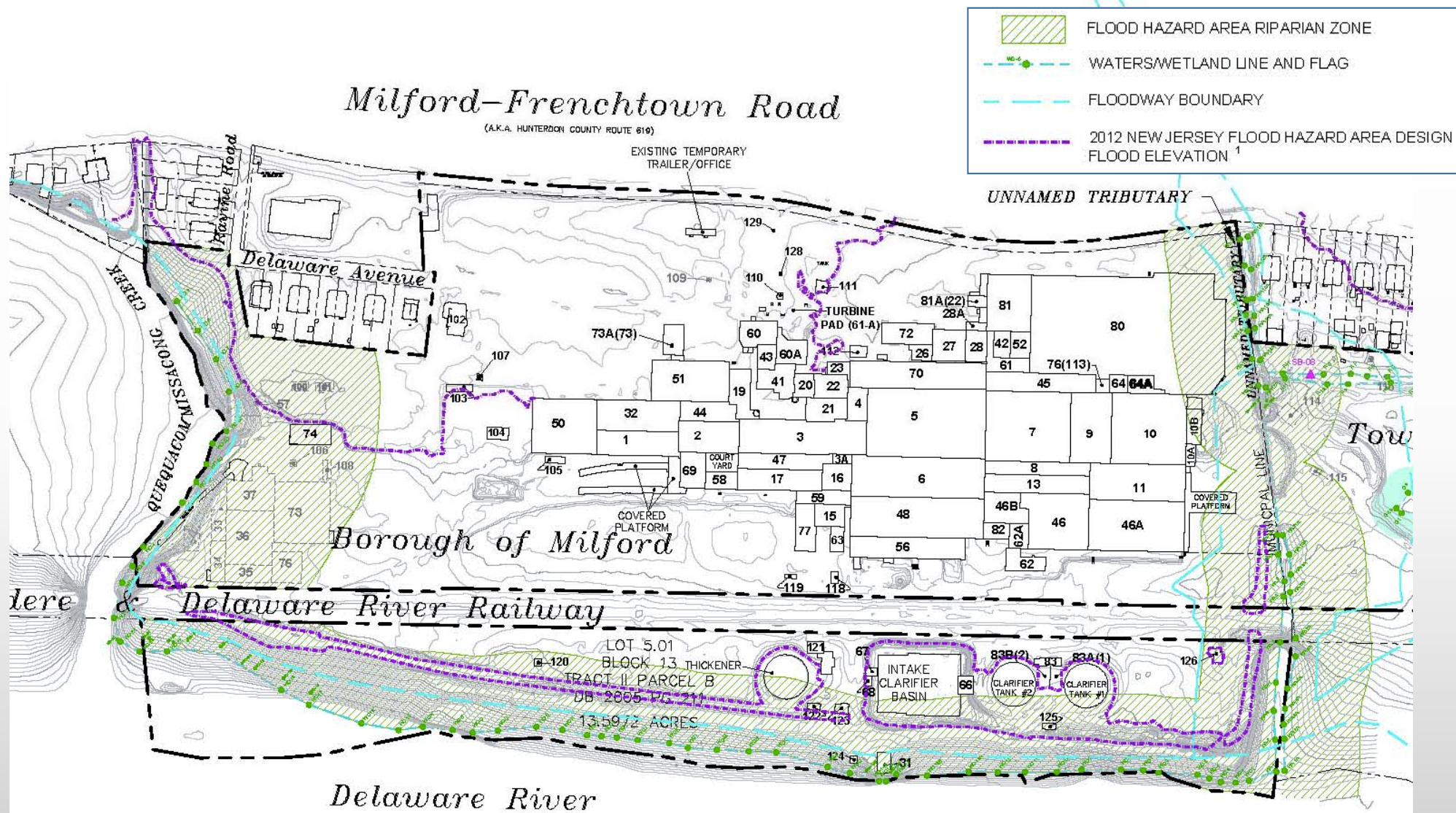
- Demolition of buildings and associated structures, with the exception of Building 74 in the former CFA and Building 31 in the former WWTPA
- Beneficial reuse of building materials on site as backfill in basements
- Site grading to modify stormwater management system



PERMIT EQUIVALENCY APPLICATION

- Demolition will occur within regulated areas
 - State open waters
 - Flood hazard area
 - Riparian zone
- Demonstrates compliance with regulations



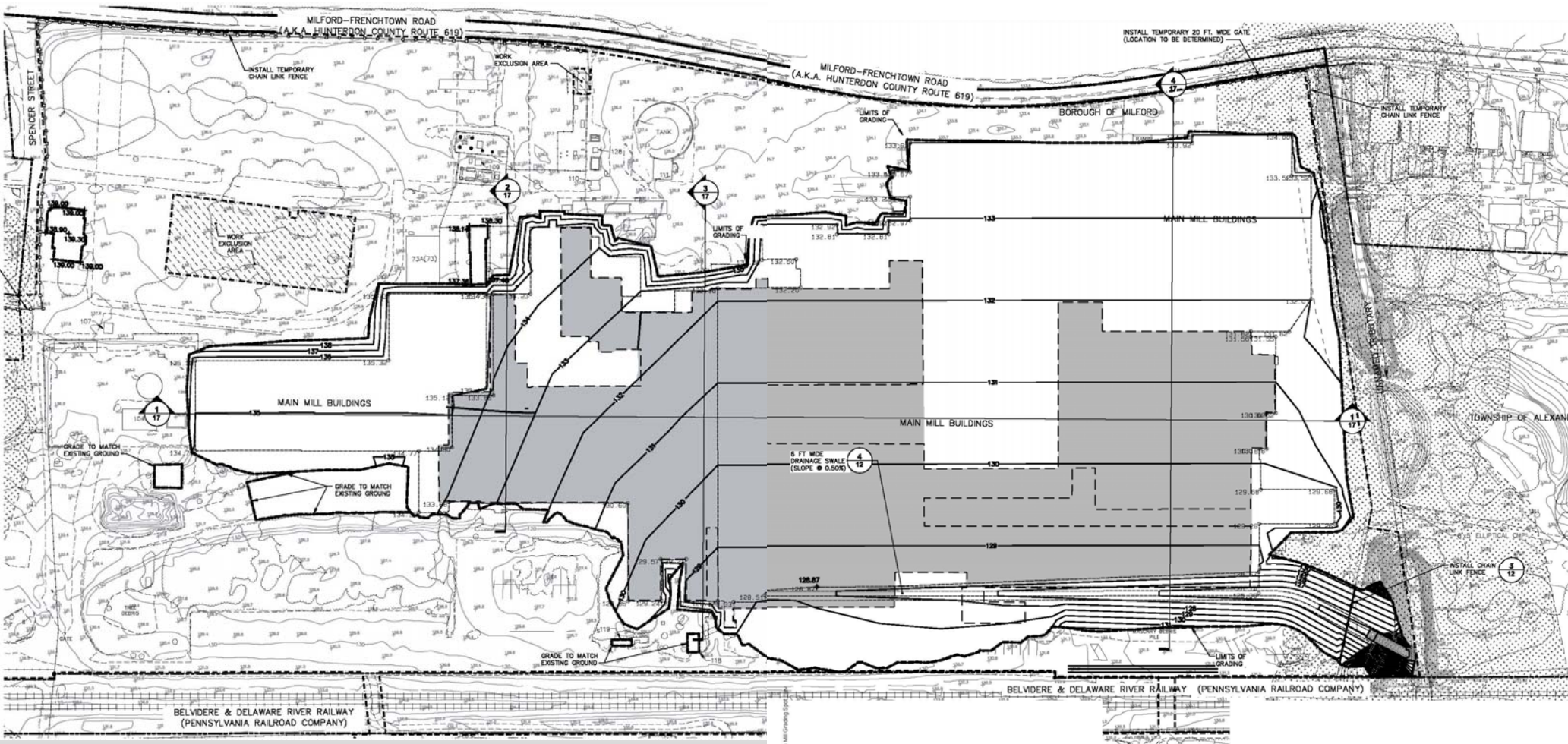


PERMIT EQUIVALENCY APPLICATION

Table of Contents

- Section 1 – Introduction
- Section 2 – Site Description
- Section 3 – Environmental Inventory
- Section 4 – Proposed Regulated Activities
- Section 5 – N.J.A.C. 7:13 Regulatory Compliance
- Section 6 – Compliance with Freshwater Wetlands Protection Act Rules
- Section 7 – Restoration Plan
- Section 8 – Flood Storage Capacity Accounting
- Section 9 – Summary and Conclusions
- Section 10 – References





MMA Grading Plan

APPROXIMATE FLOOD STORAGE CREDITS

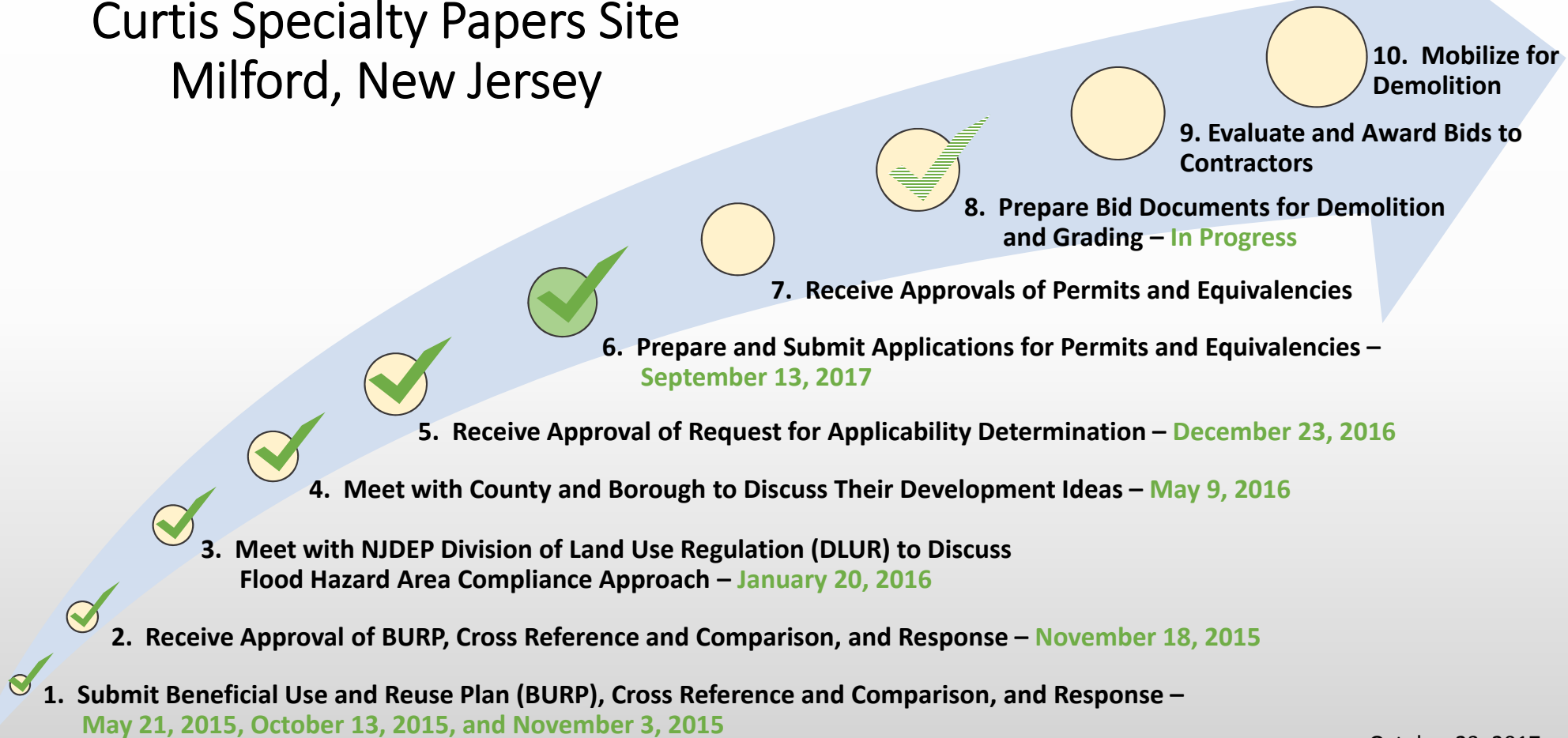
Activity	Approximate Total (CY)
Credits from Past Activities	104,000
Credits from Future Proposed Activities (provided in the Request for Applicability Determination)	120,000
Total	224,000
Credits Required for Phase I Demolition Activities (including post-demolition backfilling and grading)	43,000
Total Remaining Credits	181,000



QUESTIONS

PREPARING FOR DEMOLITION

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